

January 27, 2025

Ms. Lisa Felice
Executive Secretary
Michigan Public Service Commission
7109 West Saginaw Highway
Post Office Box 30221
Lansing, MI 48909

Re: Case No. U-12486 – In the matter, on the Commission’s own Motion, to enforce the provisions of 2000 PA 141 with respect to mercury emissions

Dear Ms. Felice:

Enclosed for electronic filing in the above-captioned case is **Consumers Energy Company’s Annual Report in Response to the Michigan Public Service Commission’s June 19, 2000 Order**. This is a paperless filing and is therefore being filed only in a PDF format.

Sincerely,

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cc: Michael Byrne, MPSC

STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

In the matter, on the Commission's own motion, to)
enforce the provisions of 2000 PA 141 with respect) Case No. U-12486
to mercury emissions.)
_____)

CONSUMERS ENERGY COMPANY'S
MERCURY REPORT FOR CALENDAR YEAR 2024
IN RESPONSE TO JUNE 19, 2000 ORDER

A. Introduction

Consumers Energy Company ("Consumers Energy" or the "Company") submits the enclosed report in response to the Michigan Public Service Commission's ("MPSC" or the "Commission") June 19, 2000, Order in the captioned docket. The Commission ordered the owner or operator of each electrical power generating facility in Michigan to file a report showing that it is in compliance with all applicable federal Environmental Protection Agency ("EPA") regulations governing mercury emissions and how it determined that it is in compliance. If any facility is not in compliance, the report shall detail how it will bring itself into compliance and shall commit to a date for full compliance. The Commission also ordered that the first report required under Case No. U-12486 be filed within 90 days of the Commission's June 19, 2000 Order, and that each subsequent report be filed by January 31 of each succeeding year. The following report satisfies the requirements of Subsection 10d(9) 2000 PA 141; MCL 460.10d(2); and MSA 22.13(10d)(9). In summary, Consumers Energy's electrical power generating facilities are in compliance with EPA regulations governing mercury emissions. Compliance is determined and maintained via emissions monitoring and or work practice standards, as well as diligent review of any new or emerging environmental rules, regulations, or statutes.

B. Overview of Consumers Energy's Electric Generating Facilities

Consumers Energy is the majority owner and operator of electrical power generating facilities, utilizing various fuel alternatives.

1. Hydro Electric Facilities

- Alcona Dam;
- Calkins Bridge Dam;
- Cooke Dam;
- Croton Dam;
- Five Channels Dam;
- Foote Dam;
- Hardy Dam;
- Hodenpyl Dam;
- Loud Dam;
- Ludington Pumped Storage;
- Mio Dam;

- Rogers Dam;
- Tippy Dam; and
- Webber Dam.

The generating facilities listed above are hydroelectric generation facilities and there are no federal control and reporting requirements applicable to any negligible mercury emissions originating from auxiliary fossil fuel fired equipment located at the listed hydroelectric generating facilities. Therefore, the above facilities are in compliance with all applicable EPA regulations governing mercury emissions.

2. Natural Gas

- Jackson Generating Station;
- Zeeland Generating Station; and
- Covert Generating Station.

The EPA has deemed that atmospheric mercury emissions from these units are negligible. No federal control or reporting requirements exist for mercury resulting from the combustion of natural gas. Therefore, the facilities listed above are in compliance with all applicable EPA regulations governing mercury emissions.

3. Natural Gas & Oil

- DE Karn 3 and 4.

The DE Karn Units 3 and 4 utilize both natural gas and oil as fuel. The EPA has promulgated a rule, known as the Mercury and Air Toxics Standard (“MATS”), to control mercury and other pollutants from coal and oil-fired units under Section 112 of the federal Clean Air Act. Specifically, the MATS rule applies to the following emissions for oil fired units:

- Particulate Matter (“PM”) – a surrogate of non-mercury metals;
- Hydrogen chloride (“HCl”) – a surrogate for acid gases; and
- Hydrogen fluoride (“HF”).

The MATS rule, however, makes special provisions for units meeting the definition of limited use liquid oil-fired subcategory - namely an oil-fired electric utility steam-generating unit with an annual capacity factor of less than 8 percent of its maximum or nameplate heat input, whichever is greater, averaged over a 24-month block contiguous period commencing April 16, 2015. Units meeting this definition are exempt from additional controls and emission limitations for the pollutants listed above but must comply with acceptable work practice standards.

The DE Karn Units 3 and 4 meet the definition for the limited-use subcategory. Consequently, the compliance plan for these units is the implementation of acceptable work practice standards, which Consumers Energy has done, and therefore DE Karn Units 3 and 4 are in compliance with all applicable EPA regulations governing mercury emissions.

4. Coal

- JH Campbell 1, 2, and 3.

As discussed above, the EPA has promulgated a rule to control mercury and other pollutants from coal and oil-fired units under Section 112 of the federal Clean Air Act, known as MATS. The intent was to address mercury by using the Maximum Achievable Control Technology (“MACT”) provisions in Section 112 of the federal Clean Air Act. By using a MACT-based approach, the EPA will also be requiring reductions for additional non-mercury categories of pollutants emitted by Electric Generating Units:

For coal-fired units:

- PM – a surrogate for non-mercury heavy metals;
- Either:
 - HCl – a surrogate for acid gases; or
 - Sulfur dioxide (“SO₂”) – a surrogate for acid gases if the unit controlled by spray dry absorber (“SDA”) or dry sorbent injection (“DSI”); and
- Organics including dioxins and furans.

Michigan has promulgated a state mercury rule, often referred to as the Michigan Mercury Rule, and codified as Part 15 of the Michigan Air Pollution Control Rules. The Michigan Department of Environment, Great Lakes, and Energy (“EGLE”), formerly known as the Michigan Department of Environmental Quality, revised the Part 15 Rules in October of 2013 to exempt units subject to MATS from also being subject to the Michigan Mercury Rule.

The following Consumers Energy facilities utilize coal as their primary fuel: JH Campbell Units 1, 2, and 3. These units are subject to the MATS rule. In addition to the pollutants listed above, the MATS rule also applies to mercury emissions.

Consumers Energy has installed the following control equipment as required by the MATS, and JH Campbell Units 1,2, and 3 are in compliance with all MATS required emission limits.

JH Campbell Unit 1:

- A Pulse Jet Fabric Filter (“PJFF”) is used for PM control as well as support for additional equipment to reduce mercury and acid gases.
- Activated Carbon Injection (“ACI”) is used to meet the MATS rule requirements for mercury.
- DSI is used to meet the MATS rule requirements for acid gases.
- Consumers Energy utilizes work practice standards, per the MATS rule, to address organics including dioxins and furans.

JH Campbell Unit 2:

- A PJFF is used for PM controls as well as support for additional equipment to reduce mercury and acid gases.
- ACI is used to meet the MATS rule requirements for mercury.
- DSI is used to meet the MATS rule requirements for acid gases.
- Consumers Energy utilizes work practice standards, per the MATS rule, to address organics including dioxins and furans.

JH Campbell Unit 3:

- A PJFF is used for PM controls as well as support for possible additional equipment to reduce mercury and acid gases.
- ACI is used to meet the MATS rule requirements for mercury.
- An SDA is used to meet the MATS rule requirements for acid gases.
- Consumers Energy utilizes work practice standards, per the MATS rule, to address organics including dioxins and furans.

5. Wind

- Lake Winds® Energy Park;
- Cross Winds® Energy Park;
- Gratiot Farms® Wind Project;
- Crescent Wind® Energy Park; and
- Heartland Wind® Farm

The generating facilities listed above are wind generation facilities. These facilities do not generate mercury emissions to the atmosphere and there are no federal control and reporting requirements applicable to any negligible mercury emissions originating from any auxiliary fossil fuel fired equipment located at the listed generating facilities. Therefore, the facilities listed above are in compliance with all applicable EPA regulations governing mercury emissions.

6. Solar

- Grand Valley State University Solar Gardens;
- Western Michigan University Solar Gardens;
- Circuit West Solar; and
- Cadillac Solar and Battery

The generating facilities listed above are solar generation facilities. These facilities do not generate mercury emissions to the atmosphere and there are no federal control and reporting requirements applicable to any negligible mercury emissions originating from any auxiliary fossil fuel fired equipment located at the listed generating facilities. Therefore, the facilities listed above are in compliance with all applicable EPA regulations governing mercury emissions.

C. Summary

In summary, Consumers Energy electrical power generating facilities are in compliance with EPA regulations governing mercury emissions as listed and detailed above. Compliance is determined and maintained via emissions monitoring and or work practice standards, as well as diligent review of any new or emerging environmental rules, regulations, or statutes.

Respectfully submitted,

January 27, 2025

CONSUMERS ENERGY COMPANY