

**STATE OF MICHIGAN
DEPARTMENT OF ENVIRONMENTAL QUALITY, WATER RESOURCES DIVISION AND
DEPARTMENT OF NATURAL RESOURCES**

In the matter of:

ACO-000189

Date Entered: 1-27-2015

Lansing Board of Water and Light
Otto E. Eckert Power Station
601 Island Avenue
Lansing, Michigan 48910

ADMINISTRATIVE CONSENT ORDER

This Administrative Consent Order (Consent Order) results from allegations by the Department of Environmental Quality (DEQ) and the Department of Natural Resources (DNR) concerning the Otto E. Eckert Power Station (Eckert Station), located at 601 Island Avenue, Lansing, Ingham County, Michigan. The Eckert Station is a coal-fired electric and steam power generating plant, owned and operated by the Lansing Board of Water & Light (BWL). The BWL is a City of Lansing agency and municipally owned utility company that is organized under the Lansing City Charter as permitted by the Home Rules Cities Act, MCL 117.4(f)(c). For purposes of this Consent Order only, the term "State" means the DEQ, Water Resources Division (WRD) and the DNR, Fisheries Division (FD), collectively. The BWL and the State agree to resolve the allegations set forth herein through entry of this Administrative Consent Order (Consent Order).

I. JURISDICTIONAL STATEMENT

- 1.1 The Natural Resources and Environmental Protection Act, 1994 PA 451, as amended (NREPA), MCL 324.3101 *et seq.* is an act that protects the environment and natural resources in the state.
- 1.2 The BWL is governed by a Board of Commissioners which are delegated administrative, executive, and policy-making authority over the operation of the City utility services assigned to it in accordance with the Lansing City Charter. The BWL is a person within the meaning of section 301 of the NREPA, MCL 324.301(h).
- 1.3 The Hunting and Fishing Licensing Act, Part 435, of the NREPA, MCL 324.43501 *et seq.* (Part 435), provides for the protection of aquatic species in waters over which the state has jurisdiction. The DNR has authority to enforce Part 435.

- 1.4 The Water Resources Protection Act, Part 31 of the NREPA, MCL 324.3101 *et seq.* (Part 31), and the rules promulgated pursuant thereto, provides for the protection, conservation, and the control of pollution of the water resources of the state. The DEQ, WRD, has authority to enforce Part 31.
- 1.5 Solely for the purpose of resolving this dispute and in connection with this Consent Order, the BWL agrees not to contest the jurisdiction of the State to enter this Consent Order on the grounds asserted.

II. STIPULATIONS

- 2.1 Section 43509(1) of Part 435 of the NREPA, MCL 324.43509 states:

"A person 17 years of age or older shall not take aquatic species, except aquatic insects, in or upon any waters over which this state has jurisdiction or in or upon any lands within the state, or possess aquatic species, except aquatic insects, without having in his or her possession a valid license as provided in this part."
- 2.2 Section 43558(1)(d) of Part 435 of the NREPA, MCL 324.43558(1)(d), makes it a misdemeanor to take an aquatic species without a license when a license is required.
- 2.3 Under common law, the State of Michigan is a public trustee of fish and wildlife in the state. The State has a common law cause of action to seek reimbursement for damages for unlawful destruction or impairment of its fishery resources.
- 2.4 Section 3106 of Part 31, MCL 324.3106, states in part, "[t]he department shall issue permits that will assure compliance with state standards to regulate municipal, industrial, and commercial discharges . . . that may affect the quality of the waters of the state." The BWL's Eckert Station is authorized to discharge industrial wastewater to the Grand River under the National Pollutant Discharge Elimination System Permit No. MI0004464, issued by the WRD to the BWL on April 30, 2008 (NPDES Permit).

2.5 Section 3109(1) of Part 31, MCL 324.3109(1), states:

A person shall not directly or indirectly discharge into the waters of the state a substance that is or may become injurious to any of the following:

- (a) To the public health, safety, or welfare.
- (b) To domestic, commercial, industrial, agricultural, recreational, or other uses that are being made or may be made of such waters.
- (c) To the value or utility of riparian lands.
- (d) To livestock, wild animals, birds, fish, aquatic life, or plants or to their growth or propagation.
- (e) To the value of fish and game.

2.6 Rule 323.1050 of the Michigan Administrative Code (MAC), promulgated pursuant to Part 31 states:

The surface waters of the state shall not have any of the following physical properties in unnatural quantities which are or may become injurious to any designated use:

- (a) Turbidity.
- (b) Color.
- (c) Oil films.
- (d) Floating solids.
- (e) Foams.
- (f) Settleable solids.
- (g) Suspended solids.
- (h) Deposits.

2.7 Section 3115 of Part 31, MCL 324.3115, authorizes the DEQ, WRD to pursue enforcement of Part 31 and seek civil fines and reimbursement for injury to the natural resources of the state resulting from a discharge contrary to the requirements of Part 31.

2.8 The DEQ, WRD, is authorized by Section 3112(4) of Part 31, MCL 324.3112(4), to enter orders requiring persons to abate pollution, and the director of the State may delegate this

authority to a designee under Section 301(b) of the NREPA, MCL 324.301(b).

- 2.9 The BWL consents to the issuance and entry of this Consent Order and stipulates that the entry of this Consent Order constitutes a final order of the State and is enforceable as such under Section 3112(4) of Part 31. The BWL agrees not to contest the issuance of this Consent Order, and that the resolution of this matter by the entry of this Consent Order is appropriate and acceptable. It is also agreed that this Consent Order shall become effective on the date it is signed by the chief of the WRD, delegate of the director, pursuant to Section 301(b) of the NREPA.
- 2.10 The BWL and the State agree that the signing of this Consent Order is for settlement purposes only and does not constitute an admission by the BWL of the factual allegations or that the law has been violated.
- 2.11 The BWL shall resolve the allegations set forth in accordance with the requirements contained in Section IV, Compliance Program, of this Consent Order.

III. FACTUAL ALLEGATIONS

The State makes the following factual allegations:

- 3.1 The Eckert Station consists of six boiler-turbine electric generating units, one of which was recently retired. The Eckert Station property is adjacent to the Grand River. Water from the Grand River is withdrawn through two onshore intakes and pumped through the power plant to cool the steam condensers. The once-through condenser cooling water and other wastewater from the power plant discharge into Eckert Station's river flume. The flume is a concrete structure situated within and parallel to the Grand River flow which is covered by concrete slabs spaced apart, i.e. there are open spaces between the slabs.
- 3.2 According to the BWL, the flow of the Grand River does not normally enter the Eckert Station's river flume. However, river water can flow into the flume through the slatted top during high flow events, potentially allowing aquatic species to enter the flume through

the slatted top of the structure. There is also the potential for small aquatic species to be caught in the intake flow used as cooling water, pumped throughout the plant, then discharged to the river flume. If these small aquatic species survive this entrainment, they may live and grow while trapped in the flume. The cooling water in the flume is eventually pumped back to the river.

- 3.3 On January 8, 2013, staff from the BWL reported dead fish within the Eckert Station's river flume to the WRD, Lansing District Office. On January 8, 2013, WRD staff conducted a site visit and concluded there were approximately 232 dead fish within the river flume and approximately 400 dead small centrarchids (bluegill, bass and sunfish) upstream where water from the river flume is discharged. WRD staff concluded that the fish kill was likely the result of thermal shock caused by either the shut-down or start-up of the power plant. The table below is the DEQ estimate of species and count of dead fish observed:

Species	Count
Channel catfish	3
Bluegill/Rockbass	3
Small centrarchids	400
Smallmouth bass	17
Common carp	209

- 3.4 On February 20, 2013, the WRD issued the BWL Eckert Station a Violation Notice (VN) VN-005494 resulting from the fish mortality. The dead fish caused by the BWL's operations constitute an injury to the natural resources of the state under MCL 324.3115(2). The BWL's taking of fish without a license is a violation of Section 43509(1) of Part 435 of the NREPA, MCL 324.43509.
- 3.5 On March 20, 2013, the BWL submitted a written response to the WRD describing its evaluation of the incident and its risk minimization plan to prevent similar fish kill events in the future. These minimization steps included inspecting the river flume for potential fish inlets and outlets, contracting with divers to inspect the flume and the east-end flume gate, and remedying any problem areas observed. The BWL also proposed to run at

least one circulation pump during winter shutdowns to minimize the impact of water temperature change within the river flume.

- 3.6 On March 31, 2013, equipment associated with Eckert Station Boiler #4 leaked approximately 932 gallons of hydraulic oil onto the floor. An estimated 500 gallons of the oil flowed into a floor sump, travelled through a floor drain to Outfall 00C1, discharged into the Eckert Station river flume, and from there an estimated 300 gallons then discharged to the Grand River through Outfall 011A. The BWL staff properly reported the incident and immediately initiated response activities. The discharge of hydraulic oil to waters of the state is a violation of Section 3109(1) of Part 31 of the NREPA and the BWL's NPDES Permit.
- 3.7 On April 1-2, 2013, WRD and FD staff conducted a site visit to the BWL Eckert Station in response to the hydraulic oil discharge. Staff observed responsive action by the BWL staff and concluded no fish died due to the oil discharge. However, because petroleum absorbent booms were deployed, river traffic, i.e. boating, and other uses of the river in this area were not allowed until remediation was completed.
- 3.8 On April 23, 2013, the BWL submitted to the WRD a full written explanation as to the cause of the hydraulic oil discharge, response actions taken and preventative measures planned. Part II.C.7 Spill Notification of the BWL's NPDES Permit requires a written notification submitted to the WRD within ten days of a discharge. The WRD is satisfied with the BWL's responsive actions; however, the BWL submitted its response to the WRD later than the ten-day deadline.
- 3.9 The BWL's response activities included discharge notification, immediate deployment of absorbent boom and skirted containment in multiple locations, monitoring and replacement of booms and pads, the use of vacuum trucks to remove oil from the river flume and river, pressure cleaning at multiple locations including the plant drains, Outfall 00C1 and the river flume, and plugging the floor drains connected to Outfall 00C1 to prevent similar discharges in the future. The BWL indicated that the environmental cleanup was completed by April 12, 2013.

- 3.10 On June 12, 2013, the WRD issued the BWL-Eckert Station VN-005589 alleging the oil discharge was a violation of Part 31 and the BWL's NPDES Permit.
- 3.11 On March 24, 2014, the WRD issued the BWL-Eckert Station Enforcement Notice No. EN-000189 alleging the violations mentioned herein.
- 3.12 On April 15, 2014, a representative from the BWL met with WRD and FD staff to discuss the violations. During that meeting, FD staff shared examples of technologies deployed throughout the state specifically used to keep fish out of target areas. FD staff agreed to meet BWL staff on-site at the Eckert Station to discuss the technologies further.
- 3.13 On July 10, 2014, FD staff met with BWL staff on-site at the Eckert Station to discuss protection technologies including the installation of a punch plate screen to prevent fish from entering the flume.

IV. COMPLIANCE PROGRAM

IT IS THEREFORE AGREED AND ORDERED THAT the BWL shall take the following actions to resolve violations of Part 31, Part 435, the RJA, and common law:

- 4.1 The BWL shall prevent unauthorized discharges, including but not limited to hydraulic oil, in accordance with Part 31 and its NPDES Permit.
- 4.2 **Not later than 120 days** after the effective date of the Consent Order, the BWL shall submit to the FD and WRD, for review and approval, the facility's Corrective Action Plan (CAP) to evaluate a cost-effective means of eliminating, to the extent technically feasible, the taking of fish within its river flume and at its onshore intakes.
- 4.3 **Not later than 30 days** after receiving comments from the FD and WRD on the CAP, the BWL shall incorporate the FD's and WRD's comments in to the proposed CAP and submit the revised CAP to the FD and WRD for review and approval. Comments from the FD

and WRD shall be consistent with the CAP's objective set forth in the preceding paragraph.

- 4.4 BWL's CAP, once granted final approval by the FD and WRD, shall contain requirements, deadlines and completion dates that shall be incorporated into and enforceable by the terms of this Consent Order.
- 4.5 The BWL shall submit the CAP required by this section to the DNR, FD, Habitat Management Unit, Program Manager, P.O. Box 30446, Lansing, Michigan 48909 and WRD, Lansing District Office, 525 W. Allegan (Constitution Hall 1S), P.O. Box 30242, Lansing, Michigan 48909. The cover letter with each submittal shall identify the specific paragraph and requirement of this Consent Order that the submittal is intended to satisfy.

V. APPROVAL OF SUBMITTALS

- 5.1 For any work plan, proposal, or other document, excluding applications for permits or licenses, that are required by this Consent Order to be submitted to the FD and WRD by the BWL, the following process and terms of approval shall apply.
- 5.2 The CAP required to be submitted by this Consent Order shall include all of the information required by the applicable statute and/or rule, and all of the information required by the applicable paragraph(s) of this Consent Order.
- 5.3 Following approval of the CAP pursuant to paragraph 4.3 above, the BWL shall submit written reports as necessary, but not less than quarterly, describing the tasks completed, the tasks yet to be completed, and any proposed change to the design or implementation of the CAP. In the event the State disapproves of a proposed change it will notify the BWL, in writing within 30 days, specifying the reasons for such disapproval. The BWL shall submit, within 30 days of receipt of such disapproval, a revised report which adequately addresses the reasons for the State's disapproval. If the revised work plan, proposal, or other document is still not acceptable to the State, the State shall notify the BWL of this disapproval.

- 5.4 Upon State approval, or approval with modifications, of a proposed change to the CAP the document(s) describing the approved change shall be incorporated by reference into this Consent Order and shall be enforceable in accordance with the provisions of this Consent Order.
- 5.5 Failure by the BWL to submit the CAP or periodic reports within the applicable time periods specified above, constitutes a violation of this Consent Order and shall subject the BWL to the enforcement provisions of this Consent Order, including the stipulated penalty provisions specified in paragraph 10.4.
- 5.6 Any delays caused by the BWL's failure to submit a document when due shall in no way affect or alter the BWL's responsibility to comply with any other deadline(s) specified in this Consent Order.
- 5.7 No informal advice, guidance, suggestions, or comments by the State regarding the CAP or periodic reports submitted by the BWL will be construed as relieving the BWL of its obligation to obtain written approval, if and when required by this Consent Order.

VI. EXTENSIONS

- 6.1 The BWL and the State agree that the State may grant the BWL a reasonable extension of the specified deadlines set forth in this Consent Order. Any extension shall be preceded by a written request in duplicate to the DEQ, WRD, Enforcement Unit Chief, Constitution Hall, 525 West Allegan Street, Lansing, Michigan 48909-7773, no later than ten business days prior to the pertinent deadline, and shall include:
 - a. Identification of the specific deadline(s) of this Consent Order that will not be met.
 - b. A detailed description of the circumstances that will prevent the BWL from meeting the deadline(s).
 - c. A description of the measures the BWL has taken and/or intends to take to meet the required deadline.

- d. The length of the extension requested and the specific date on which the obligation will be met.

The DEQ, WRD Enforcement Unit Chief on behalf of the State, shall respond in writing to such requests. No change or modification to this Consent Order shall be valid unless in writing from the DEQ, WRD Enforcement Unit Chief, and if applicable, signed by both parties.

VII. REPORTING

- 7.1 The BWL shall verbally report any violation(s) of the terms and conditions of this Consent Order to the DEQ, WRD Enforcement Unit Chief by no later than the close of the next business day following detection of such violation(s) and shall follow such notification with a written report within ten business days following detection of such violation(s). The written report shall include a detailed description of the violation(s), as well as a description of any actions proposed or taken to correct the violation(s). The BWL shall report any anticipated violation(s) of this Consent Order to the above-referenced individual in advance of the relevant deadlines whenever possible.

VIII. RETENTION OF RECORDS

- 8.1 Upon request by an authorized representative of the State, the BWL shall make available to the State all records, plans, logs, and other documents required to be maintained under this Consent Order or pursuant to Part 31 or its rules. All such documents shall be retained by the BWL for at least a period of three years from the date of generation of the record unless a longer period of record retention is required by Part 31 or its rules.

IX. RIGHT OF ENTRY

- 9.1 The BWL shall allow any authorized representative or contractor of the State, upon presentation of proper credentials, to enter upon the premises of the facility at all reasonable times for the purpose of monitoring compliance with the provisions of this

Consent Order. This paragraph in no way limits the authority of the State to conduct tests and inspections pursuant to the NREPA and the rules promulgated thereunder, or any other applicable statutory provision.

X. PENALTIES

- 10.1 The BWL agrees to pay to the State of Michigan **\$4,826.00** as partial compensation for the cost of investigations and enforcement activities arising from the violations specified in Section III of this Consent Order. Payment shall be made within 30 days of the effective date of this Consent Order in accordance with paragraph 10.7.
- 10.2 The BWL agrees to pay a civil fine of **\$8,250.00** for the violations specified in Section III of this Consent Order. Payment shall be made within 30 days of the effective date of this Consent Order in accordance with paragraph 10.7.
- 10.3 The BWL agrees to pay **\$11,808.00** in compensation for natural resource damages associated with the fish kill as specified in Section III of this Consent Order. Payment shall be made within 30 days of the effective date of this Consent Order in accordance with paragraph 10.7.
- 10.4 For each failure to comply with a provision of Section IV or V of this Consent Order, the BWL shall pay stipulated penalties of **\$200** per violation per day for 1 to 7 days of violation, **\$300** per violation per day for 8 to 14 days of violation, and **\$500** per violation per day for each day of violation thereafter.
- 10.5 For each failure to comply with a provision of Section VII, VIII, or IX of this Consent Order, or any other requirement of this Consent Order, the BWL shall pay stipulated penalties of **\$200** per violation per day for each day of violation.
- 10.6 To ensure timely payment of the above civil fine, costs, and stipulated penalties, the BWL shall pay an interest penalty to the General Fund of the State of Michigan each time it

fails to make a complete or timely payment. This interest penalty shall be based on the rate set forth at MCL 600.6013(8), using the full increment of amount due as principal, and calculated from the due date for the payment until the delinquent payment is finally made in full.

- 10.7 The BWL agrees to pay all funds due pursuant to this agreement by check made payable to the State of Michigan and delivered to the Accounting Services Division, Cashier's Office for State, P.O. Box 30657, Lansing, MI 48909-8157; or hand delivered to the Accounting Services Division, Cashier's Office for State, 425 W. Ottawa Street, Lansing, MI 48933. To ensure proper credit, all payments made pursuant to this Consent Order must include the **Payment Identification No. WRD90007**.
- 10.8 The BWL agrees not to contest the legality of the costs paid, civil fine, or natural resource damages compensation pursuant to paragraphs 10.1, 10.2, and 10.3, above. The BWL further agrees not to contest the legality of any stipulated penalties or interest penalties assessed pursuant to paragraphs 10.4, 10.5, and 10.6, above, but reserves the right to dispute the factual basis upon which a demand by the State for stipulated penalties or interest penalties is made.

XI. FORCE MAJEURE

- 11.1 The BWL shall perform the requirements of this Consent Order within the time limits established herein, unless performance is prevented or delayed by events that constitute a "Force Majeure." Any delay in the performance attributable to a "Force Majeure" shall not be deemed a violation of the BWL's obligations under this Consent Order in accordance with this Section.
- 11.2 For the purpose of this Consent Order, "Force Majeure" means an occurrence or nonoccurrence arising from causes not foreseeable, beyond the control of, and without the fault of the BWL, such as: an Act of God, untimely review of permit applications or submissions by the State or other applicable authority, and acts or omissions of third parties that could not have been avoided or overcome by the BWL's diligence and that

delay the performance of an obligation under this Consent Order. "Force Majeure" does not include, among other things, unanticipated or increased costs, changed financial circumstances, or failure to obtain a permit or license as a result of the BWL's actions or omissions.

- 11.3 The BWL shall notify the State, by telephone, within 48 hours of discovering any event that causes a delay in its compliance with any provision of this Consent Order. Verbal notice shall be followed by written notice within ten calendar days and shall describe, in detail, the anticipated length of delay, the precise cause or causes of delay, the measures taken by the BWL to prevent or minimize the delay, and the timetable by which those measures shall be implemented. The BWL shall adopt all reasonable measures to avoid or minimize any such delay.
- 11.4 Failure of the BWL to comply with the notice requirements and time provisions under paragraph 10.3 shall prohibit the BWL from asserting a force majeure defense under this Section as to the particular incident involved. The State may, at its sole discretion and in appropriate circumstances, waive in writing the notice requirements of paragraph 11.3, above.
- 11.5 If the parties agree that the delay or anticipated delay was beyond the control of the BWL, this may be so stipulated, and the parties to this Consent Order may agree upon an appropriate modification of this Consent Order. However, the State is the final decision-maker on whether or not the matter at issue constitutes a force majeure. The parties to this Consent Order understand and agree that the final decision by the State regarding a force majeure claim is not subject to judicial review. The burden of proving that any delay was beyond the reasonable control of the BWL, and that all the requirements of this Section XI have been met by the BWL, rests with the BWL.
- 11.6 An extension of one compliance date based upon a particular incident does not necessarily mean that the BWL qualifies for an extension of a subsequent compliance date without providing proof regarding each incremental step or other requirement for which an extension is sought.

XII. GENERAL PROVISIONS

- 12.1 With respect to any violations not specifically addressed and resolved by this Consent Order, the State reserves the right to pursue any other remedies to which it is entitled for any failure on the part of the BWL to comply with the requirements of the NREPA and its rules.
- 12.2 The State and the BWL consent to enforcement of this Consent Order in the same manner and by the same procedures for all final orders entered pursuant to Part 31, MCL 324.3101 *et seq.*; and enforcement pursuant to Part 17, Michigan Environmental Protection Act, of the NREPA, MCL 324.1701 *et seq.*
- 12.3 This Consent Order in no way affects the BWL's responsibility to comply with any other applicable State, federal, or local laws or regulations.
- 12.4 The WRD reserves its right to pursue appropriate action, including injunctive relief to enforce the provisions of this Consent Order, and at its discretion, may also seek stipulated fines or statutory fines for any violation of this Consent Order. However, the WRD is precluded from seeking both a stipulated fine under this Consent Order and a statutory fine for the same violation.
- 12.5 In the event the BWL sells or transfers the facility, it shall advise any purchaser or transferee of the existence of this Consent Order in connection with such sale or transfer. Within 30 calendar days, the BWL shall also notify the WRD Lansing District Supervisor, in writing, of such sale or transfer, the identity and address of any purchaser or transferee, and confirm the fact that notice of this Consent Order has been given to the purchaser and/or transferee. The purchaser and/or transferee of this Consent Order must agree, in writing, to assume all of the obligations of this Consent Order. A copy of that agreement shall be forwarded to the WRD Lansing District Supervisor within 30 days of assuming the obligations of this Consent Order. The WRD Lansing District Supervisor's address is P.O. Box 30242, Lansing, Michigan 48909-7742.

- 12.6 The provisions of this Consent Order shall apply to and be binding upon the parties to this action, and their successors and assigns.
- 12.7 This Consent Order, once satisfied by the BWL, constitutes a full and complete settlement and release of all claims and causes of action for those matters specifically identified herein; however, it does not resolve any criminal action that may result from these same violations.
- 12.8 The signatory to this Consent Order on behalf of the BWL agrees and attests that he is fully authorized to assure that the BWL will comply with all requirements under this Consent Order.

XIII. TERMINATION

- 13.1 This Consent Order shall remain in full force and effect until terminated by a written Termination Notice (TN) issued by the State. Prior to issuance of a written TN, the BWL shall submit a request consisting of a written certification that the BWL has fully complied with the requirements of this Consent Order and has made payment of any fines, including stipulated penalties, required in this Consent Order. Specifically, this certification shall include:
- a. The date of compliance with each provision of the compliance program in Section IV, and the date any fines or penalties were paid.
 - b. A statement that all required information has been reported to the State.
 - c. Confirmation that all records required to be maintained pursuant to this Consent Order are being maintained at the facility.

The State may also request additional relevant information. The State shall not unreasonably withhold issuance of a TN.

Signatories

The undersigned CERTIFY they are fully authorized by the party they represent to enter into this Consent Order to comply by consent and to EXECUTE and LEGALLY BIND that party to it.

DEPARTMENT OF ENVIRONMENTAL QUALITY



By: William Creal, Chief
Water Resources Division

1/27/2015
Date

DEPARTMENT OF NATURAL RESOURCES



By: Keith Creagh, Director
Department of Natural Resources

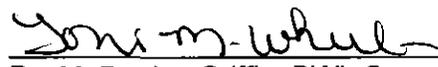
1/23/2015
Date

LANSING BOARD OF WATER & LIGHT



By: J. Peter Lark, BWL General Manager

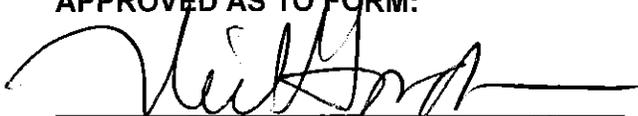
12/22/14
Date



By: ~~M. Denise Griffin~~, BWL Corporate Secretary
Tom M. Wheeler Acting

12/22/14
Date

APPROVED AS TO FORM:



By: Neil D. Gordon, Assistant Attorney General
For: S. Peter Manning, Chief
Environment, Natural Resources, and Agriculture Division
Michigan Department of Attorney General

1/8/15
Date

APPROVED


BOA: BOARD OF WATER & LIGHT
COUNSEL
Date 12/18/14