

April 27, 2022

VIA E-MAIL at SzajnerK@Michigan.gov

**RE: Consumers Energy Comments to Staff on Michigan Integrated Resource Planning Parameters (“MIRPP”) and Integrated Resource Plan (“IRP”) Filing Requirements**

Dear Mr. Szajner:

The Company appreciates Staff’s efforts leading the Advanced Planning Phase III workgroup collaborative discussions on April 14, 2022 and the [presentations](#) made by members of EGLE Staff. The Company thanks Staff for providing the opportunity for discussion and comment.

The Company requests consideration of the following comments in response to Staff’s request for feedback about the approach to environmental considerations in IRP filings discussed during the meeting:

1. Environmental Justice Topics (slide 7)

The discussion on April 14 focused on two primary questions around environmental justice: (a) what term should be used for communities identified by an environmental justice screening tool, and (b) what percentile or score should be used to qualify a community as potentially vulnerable when using a screening tool?

On the first question, Consumers Energy recognizes that communities may have a variety of perspectives and feelings when labeled with any term associated with environmental justice. Because of this, Consumers Energy believes that EGLE should solicit feedback from communities that are known to have potential environmental justice concerns on what term is most appropriate. In this way, the communities that may receive such a label have input on what label is used to describe them. Beyond this, Consumers Energy does not take a position on the most appropriate term.

On the second question, Consumers Energy directly addressed this question in its comments submitted to EGLE on April 1. In short, Consumers Energy supports a community being identified as potentially vulnerable at the 75<sup>th</sup> percentile or higher. If a percentile lower than that is selected, we request that EGLE provide its rationale for public comment and feedback.

Respectfully submitted,

Consumers Energy Company