

# CITIZENS CONSULTING GROUP, LLC

Local Control Advisor

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Dear Parties to the Settlement Agreement (CMS Energy, Michigan Department of Attorney General, etc.<sup>1</sup>) and Ottawa County Board of Commissioners and Township Boards in Ottawa County:

The citizens of Ottawa County, Michigan, whose interests we seek to defend, are significantly and unnecessarily harmed by the accelerated closure of the J.H. Campbell Generating Plant, located in the county. It is a source of significant tax revenue and employment in the county, not to mention many other benefits it provides in the region (e.g., reliable electric at an affordable price, etc.) It appears that the accelerated closure, from 2040 to 2025, is now scheduled well in advance of the closure of DTE's Monroe plant, even though the Monroe plant emits far more carbon dioxide into the atmosphere, as well as chemicals properly classified as pollutants.<sup>2</sup> Conversely, there are attempts to reverse the decision regarding the Palisades nuclear plant based on concerns regarding the stability of the regional electric grid to West Michigan consumers despite significant historical operational and management issues, as well as the complexities of recommissioning the facility. The Settlement Agreement was predicated on the assumption that 8000 MW of renewable electric power can be developed over the next 16 years in the region. In fact, this amount of energy would require a solar farm occupying approximately 12.5 square miles as well as extensive new transmission and storage infrastructure. The inconsistencies between apparent concern over the economic stability of electric grid versus disparate assessment of the risk of carbon dioxide emissions by facility suggest that more rigorous assessment of the issues is warranted.

The current legislatively mandated goals for "clean energy" systems includes highly efficient carbon capture systems to avoid carbon dioxide emissions. A more measured assessment of these facts should include the reality that the extensive electricity transmission infrastructure would also be abandoned should the closure of J.H. Campbell Generating Plant move forward. It is disconcerting that no consideration of the technological advances related to adaptation of Allam cycle technology were discussed during the fact-finding process. This rapidly advancing technology would provide for continued use of the regional infrastructure for the stable provision of electrical power to the regional consumers while simultaneously eradicating carbon dioxide emissions. The Allam Cycle waste streams of high purity carbon dioxide, water, and waste heat can be efficiently deployed for commercial efficiency of the facility. Carbon dioxide, efficiently and safely captured, is required for many essential and important commercial products.

Given the above considerations, we petition all parties to the Settlement Agreement to reconsider the unnecessarily accelerated scheduled date of closure in May 2025, and to immediately initiate examination of application of Allam Cycle technology to the J.H. Campbell Generating Plant, assuming carbon dioxide emissions are driving the current policy direction.<sup>3</sup> There is also the potential to consider other commercial partners for the venture, or municipalization by the county upon charter adoption, while effectively addressing the mandate of "clean energy" systems capable of contributing to an environmentally sound portfolio for electrical power. If there is an unwillingness to pursue such, we and/or other parties may have to resort to legal action, and we would be asking for Ottawa County and some of its townships to join us in this effort. There should not be closure and demolition before more examination.

Sincerely,



J. Parnell McCarter, MBA

Manager



Anthony Senagore, MD, MS, MBA

Advisor

<sup>1</sup> <https://mi-psc.my.site.com/sfc/servlet.shepherd/version/download/0688y000003KjSDAA0> lists the other parties to the settlement agreement

<sup>2</sup> <https://www.eenews.net/articles/the-top-10-emitting-power-plants-in-america/>

<sup>3</sup> There is countervailing evidence to this theory, such as presented by Dr. William Happer of Princeton University and the increase of Antarctic sea ice over the last 40 years as noted at <https://eos.org/science-updates/new-perspectives-on-the-enigma-of-expanding-antarctic-sea-ice>.