

Date

Dear Leaders of MISO, Consumers Energy, Wolverine Power, Michigan Public Service Commission, the State of Michigan, and other interested parties:

Our regional grid operator MISO reports that “the transition that is underway to get to a decarbonized end state is posing material, adverse challenges to electric reliability.”¹ On June 20, 2024 MISO released the following: “Today, MISO and the Organization of MISO States released the annual OMS-MISO survey results, which indicate a growing capacity deficit beginning in the 2025/26 planning year. Next summer, MISO could see resource sufficiency ranging from a 2.7 GW capacity shortfall to a 1.1 GW surplus, underscoring the need to accelerate resource additions, monitor large load additions, and **delay resource retirements to reliably manage the anticipated growth in electricity demand.**”² The North American Electric Reliability Corporation also warns of impending power outages in the coming years owing to a shortfall of electric supply to meet demand.³ Under these circumstances, it would be irresponsible to proceed with the planned 2025 closure and demolition of Ottawa County’s Campbell generating plant which provides electric to over 1 million regional residents. Its retirement should be delayed in accordance with MISO’s general recommendation.

Furthermore, the Federal Department of Energy is making rapid strides in the commercial extraction of rare earth minerals needed for battery production from byproducts of coal plants.⁴ In addition, coal-based Allam cycle technology is improving, such that sequestration of carbon dioxide from coal plants may be viable in the coming years, in response to concerns related to atmospheric carbon dioxide levels.⁵ Over \$1 billion was invested in the last decade in anti-polluting equipment in the Campbell plant. Demolishing the Campbell plant precipitously will preclude utilization of a valuable asset that can be retrofitted to meet changing demands.

There are also growing indications of an effort to resume electric generation from Palisades Nuclear Power Plant in 2025,⁶ likely as one effort to compensate for closures such as the Campbell plant. This would be the first time a formerly decommissioned nuclear plant would be re-commissioned, and that in a very short timeframe. We are concerned that the safety issues cited by nuclear engineer Arnold Gunderson and others are valid,⁷ and that the associated risks are far greater than simply retaining the Campbell plant in the fleet longer.

We request that you work together to delay the Campbell plant’s closure and demolition, so as to make unnecessary legal action to effect its delay. We also request that any restart of the Palisades be further delayed in order to make fully sure it does not re-start when not sufficiently confirmed as safe to do so.

Sincerely,

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<https://cdn.misoenergy.org/Executive%20Summary%202024%20Reliability%20Imperative%20report%20Feb.%2021%20Final631825.pdf?v=2024022114214>

² <https://www.misoenergy.org/meet-miso/media-center/2024/oms-miso-survey-results-indicate-tight-resource-capacity-in-the-upcoming-planning-year/>

³ <https://www.powersystems.technology/news/us-news/nerc-report-warns-of-impending-electricity-shortages-in-north-america-by-2024.html>

⁴ <https://www.tdworld.com/electrification/article/21283105/batteries-from-coal-waste-doe-funds-projects-to-extract-rare-earth-metals-from-coal-byproducts>

⁵ <https://www.sciencedirect.com/science/article/abs/pii/S0360544223000282>

⁶ <https://www.mlive.com/education/2024/07/closed-nuclear-plants-readiness-to-restart-focus-of-next-public-meeting.html>

⁷ <https://beyondnuclear.org/wp-content/uploads/2023/12/12-5-23-CURRICULUM-VITAE-Palisades-APPX-10-COMPILED.pdf>