



October 13, 2021

Ms. Melinda Steffler, District Supervisor
Water Resource Division
Michigan Department of Environment, Great Lakes, and Energy (EGLE)
Southeast Michigan District Office
27700 Donald Court
Warren, MI 48092

Re: Cessation of Coal Notice of Planned Participation
DECO – Belle River Plt
NPDES Permit No. MI0038172

Dear Ms. Steffler,

On October 13, 2020, the Environmental Protection Agency (EPA) released the final version of the Effluent Limit Guidelines (ELG) Reconsideration Rule (2020 Rule) which updated the 2015 ELG Rule (2015 Rule). This 2020 Rule is the product of the EPA's "Reconsideration" of certain portions of the 2015 Rule, specifically addressing bottom ash transport water (BATW) and flue gas desulfurization wastewater (FGD WW).

The 2020 Rule established a compliance subcategory for electric generating unit(s) that will cease the use of coal either by retirement or by fuel conversion. The 2020 Rule allows operation of such unit(s) until December 31, 2028 if companies fulfill certain requirements regarding existing treatment technologies, the proper submittal of a Notice of Planned Participation (NOPP) and subsequent annual reports.

Per 40 CFR 423.19(f)(1), DTE Electric Company (DTE) is submitting this Cessation of Coal NOPP. The following enclosures provide the information necessary to qualify for the compliance subcategory as required by 40 CFR 423.19(f)(2).

This submittal supports DTE's Clean Vision Plan which will provide a detailed assessment of the existing and future energy needs of its customers and how the company plans to meet those needs. As the company invests in more renewable generation it will evaluate a conversion of the Belle River Power Plant to cleaner energy resources. This evaluation will be assessed in future regulatory filings.

If you have any questions relative to this submittal, please contact Matthew Goddard at (313) 235-7368 or via e-mail at matthew.goddard@dteenergy.com.

Sincerely,



Lezley Filzek
Plant Manager
Belle River Power Plant
Energy Supply - DTE Electric Company
586-484-5197

Enclosures

Cc: Sabrina Good - EGLE, Southeast Michigan District Office
Tarek Buckmaster - EGLE, WRD Permits Section
Christine Alexander - EGLE, WRD Permits Section
Jason Roggenbuck - DTE EM&S, Belle River Power Plant
Amanda Kosch - DTE EM&S
Marcela Orlandea - DTE EM&S

Enclosure 1

Notice Planned Participation (NOPP) Contents Requirements

Unit Identification

Belle River Power Plant (BLRPP) is located at 4505 King Road, China Twp., Michigan. BLRPP consists of two B&W subcritical wall-fired boilers firing low sulfur subbituminous coal rated for a maximum gross output of 1,260 MW. The units started commercial operation in 1984 and 1985. This cessation of coal NOPP will apply to both Unit 1 and Unit 2 at BLRPP.

Expected Date of Coal Cessation

Since the release of the 2020 Rule, DTE has evaluated the feasibility of coal cessation on the units at BLRPP. Except for the factors identified below in the Notice of Change section, DTE submits this NOPP with a commitment to cease burning coal at BLRPP by December 31, 2028.

Method for Cessation of Coal Burning Activities

DTE's current Integrated Resource Plan (IRP) was approved on April 15, 2020 and provided a planned retirement date for BLRPP by December 31, 2030. DTE is currently considering the application of the cessation of coal compliance subcategory by pulling forward the planned retirements of the unit(s) to December 31, 2028. The 2020 Rule details that the cessation of coal could occur by either unit retirement or repowering to another fuel source. The option to repower to another fuel source is an opportunity that DTE will explore as part of a future regulatory filing, including but not limited to Integrated Resource Plans (IRP), electric general rate cases or other regulatory filings.

DTE was initially scheduled to submit an updated IRP by September 2023 for the Michigan Public Service Commission's ("MPSC's") review, but, DTE will accelerate the timing of this filing by approximately one year. The IRP will provide a detailed analysis of DTE's long term generation plan. Upon receipt of a final order approving or denying the IRP, DTE will submit applicable documentation in the annual reports as required in 40 CFR 423.19(f)(3), to update initial information submitted in this NOPP.

Regulatory Approval of Coal Cessation

This NOPP represents the first formal submittal to a regulatory body regarding DTE's intentions to meet the 2020 Rule's cessation of coal compliance subcategory. In the preamble of the 2020 Rule, EPA acknowledges that a company may submit a cessation of coal NOPP and may not receive regulatory approval of those actions until a later date.

DTE's most recent IRP was submitted to the MPSC in 2019 and approved on April 15, 2020, prior to the release of the 2020 ELG Rule. Hence, DTE's IRP does not contain information set forth in this NOPP. As indicated previously, DTE will submit an updated IRP approximately one year earlier than the September 2023 deadline and approval of that IRP by the MPSC will qualify as the regulatory approval identified by the 2020 Rule for the cessation of coal compliance subcategory. Upon its approval, a copy of the revised IRP will be submitted to EGLE to supplement this submittal.

In addition to an updated IRP, DTE will submit appropriate documentation pursuant to 40 CFR 423.19(f)(3) if changes to the NOPP are needed as a result of the IRP process.

Supporting Documentation of Coal Cessation Commitment

This NOPP represents the first document released by DTE regarding its intentions to utilize the 2020 Rule’s cessation of coal compliance subcategory. More supporting documentation such as the next IRP (Clean Vision Plan) and future regulatory filings will provide additional documentation to support this submittal and achieve compliance with ELG requirements.

Timeline for Achieving Coal Cessation

The table below presents an itemized timeline for achieving cessation of coal at BLRPP. A timeline with milestones can be found as Enclosure 2.

Action	Estimated Timeline (Months) or Target Date	
	Fuel Conversion	Unit Retirement
Approval from grid operator to cease coal combustion	To be determined based on appropriate regulatory filing	
Permit Application Development	3	3
Conversion Engineering including coal-related systems to be decommissioned (coal storage/handling, ash handling/storage, ESP, DSI, ACI, etc.)	9	N/A
Specify, Bid, and Award: 1. Conversion Equipment and Delivery 2. General Construction	18	N/A
Pre-Outage Construction (finish-to-finish with above activity)	6	N/A
Cease Coal Operation	12/31/2028	
Outage Construction and Coal System Decommissioning (ash cleaning, coal pile removal, etc.)	3	N/A
Startup and Commissioning / Begin Operation	1	N/A
System Decommissioning (steam system draining, evacuate hydrogen from steam turbine generator, ash cleaning, fuel/lubricating/hydraulic oil removal, transformer oil removal, coal pile removal)	N/A	6
Regulated Materials Assessment	N/A	3
Specify, Bid, and Award:	N/A	6

Notice of Change to Initial NOPP

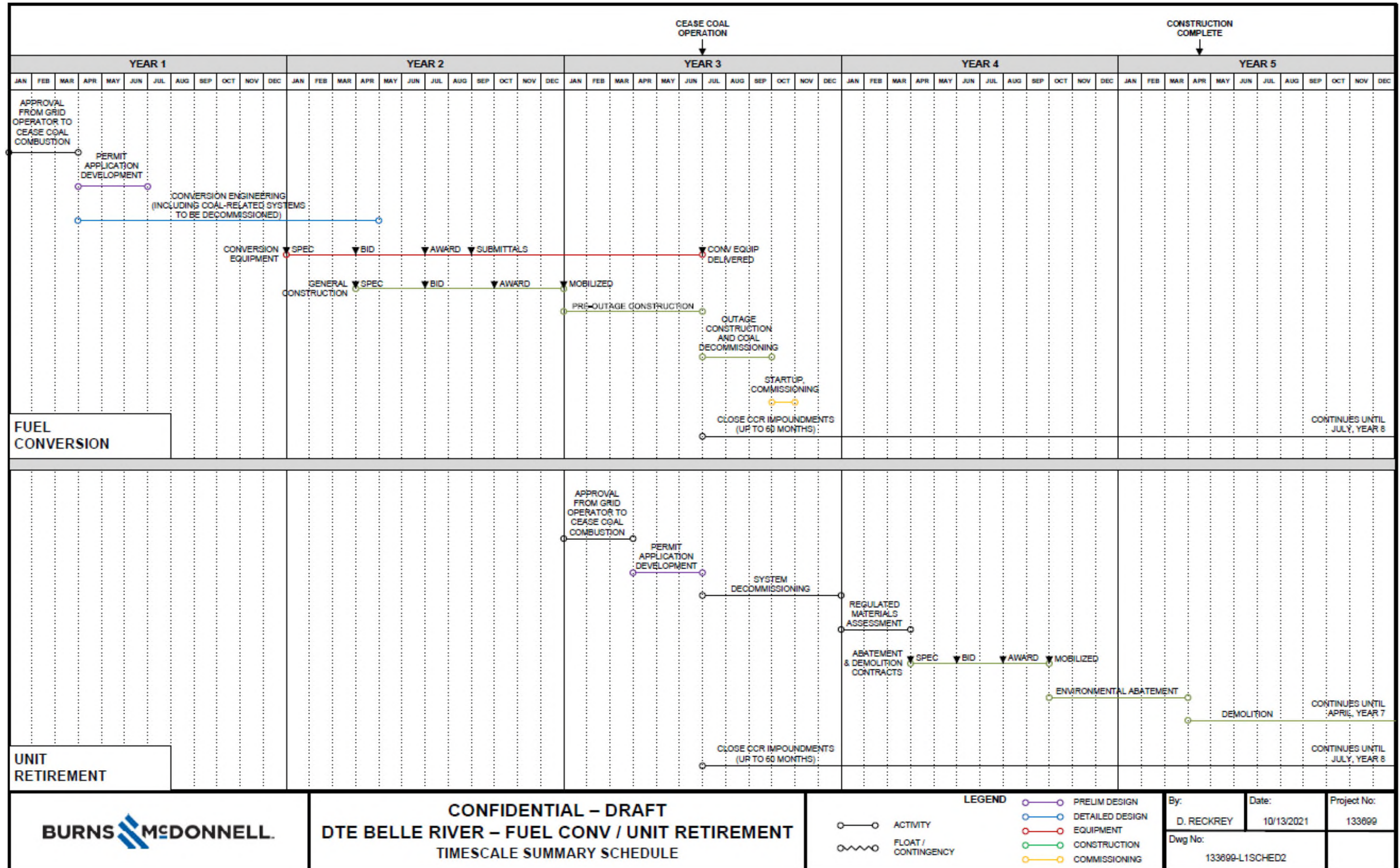
The 2020 Rule established the NOPP approach allowing permittees to declare their intent to permanently cease coal combustion. This approach requires providing the best information available at the time of the NOPP submittal, with subsequent updates to their respective permitting authority through an annual progress report.

The information presented in this NOPP represents the best information available to meet the requirements of the initial NOPP submittal. DTE has identified the following factors that could result in modifications of information submitted in this NOPP:

1. Integrated Resource Plans – The next IRP is required to be submitted by September 2023, but DTE plans to file the IRP approximately one year early. Modelling and other analyses to be conducted in conjunction with that submittal may result in changes to this NOPP.
2. Other Regulatory Filings – The IRP will provide the plan by which DTE will provide affordable and reliable electricity to its customers. However, many of the projects that will be required to achieve compliance with the 2020 Rule will need to be approved within other future DTE regulatory filings, including electric rate cases. The outcome of future regulatory matters regarding future projects may result in modifications to this NOPP.
3. Regulatory Changes / Rule Modifications – On July 26, 2021, the EPA announced that it will initiate a new rulemaking to revise the 2020 Rule for certain wastewater discharge limits. The proposed rulemaking or other potential future regulatory changes could impact DTE's ELG compliance strategy including the use of the cessation of coal compliance subcategory and associated NOPP process.
4. Other Factors to Be Determined – Other factors including, but not limited to, legal challenges to EPA's ELG rules or rulemakings conducted by future federal administrations.

The factors detailed above could result in changes to DTE's ELG compliance strategy and may result in modification of this NOPP. DTE will submit appropriate documentation pursuant to 40 CFR 423.19(f)(3) if changes to the NOPP are needed or transition to other compliance options pursuant to 40 CFR 423.19(o).

Cessation of Coal Timeline



CONFIDENTIAL – DRAFT
DTE BELLE RIVER – FUEL CONV / UNIT RETIREMENT
TIMESCALE SUMMARY SCHEDULE

CONTINUES UNTIL JULY, YEAR 8

CONTINUES UNTIL APRIL, YEAR 7

CONTINUES UNTIL JULY, YEAR 8