



April 28, 2023

Ms. Tiffany Myers, District Supervisor  
Water Resources Division  
Michigan Department of Environment, Great Lakes and Energy (EGLE)  
Jackson District Office  
301 E. Louis B. Glick Highway - 4th Floor  
Jackson, Michigan 49201

Re: Cessation of Coal Notice of Planned Participation  
DTE – Monroe Plt  
NPDES Permit No. MI0001848

Dear Ms. Myers,

On October 13, 2020, the Environmental Protection Agency (EPA) released the Effluent Limit Guidelines (ELG) Reconsideration Rule (2020 Rule) which updated the 2015 ELG Rule (2015 Rule). The 2020 Rule was 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 would cease the use of coal either by retirement or by fuel conversion. The 2020 Rule allowed operation of such unit(s) until December 31, 2028, if companies fulfilled certain requirements regarding existing treatment technologies and submitted a Notice of Planned Participation (NOPP) by October 13, 2021 in order to qualify for the subcategory. At the time, DTE was still developing its CleanVision Integrated Resource Plan (November 2022 IRP) and did not submit a NOPP for the cessation of coal combustion compliance subcategory.

On July 26, 2021, the EPA announced that it was initiating a rulemaking process to revise the 2020 Rule as a result of a review conducted in accordance with Executive Order 13990. As part of the 2020 Rule revision, on March 29, 2023, EPA took direct final action to issue a new rule to extend the date for existing coal-fired power plants to submit a NOPP for the permanent cessation of coal combustion subcategory in the 2020 Rule. The extension allows for companies to submit an NOPP by June 27, 2023 and qualify for the cessation of coal combustion subcategory established in the 2020 Rule.

In November 2022, DTE filed its IRP with the Michigan Public Service Commission (MPSC) where the Company's proposal to accelerate coal plant retirements was publicly announced. The proposed IRP includes an acceleration of Monroe Power Plant's (MONPP) retirement schedule, with Units 3 and 4 in 2028 and Units 1 and 2 in 2035. Approval of an IRP is obtained through a contested case proceeding under Michigan statute. A Final Order from the MPSC is expected in the fall of 2023, at which time DTE's proposed MONPP retirement schedule will be finalized.

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 and represents DTE's commitment to our November 2022 IRP which provides a detailed assessment of the existing and future energy needs of its customers and how the company plans to meet those needs.

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](mailto:matthew.goddard@dteenergy.com).

Sincerely,

A handwritten signature in black ink, appearing to read 'Dan Casey', with a long horizontal flourish extending to the right.

Dan Casey  
Plant Manager  
Monroe Power Plant  
Energy Supply - DTE Electric Company  
734-384-2207

Enclosures

Cc: Alexandria Seeger - EGLE, Jackson District Office  
Christine Alexander - EGLE, WRD Permits Section  
Matthew Goddard - DTE, Environmental Strategies

## Enclosure 1

### Notice Planned Participation (NOPP) Contents Requirements

#### **Facility Identification**

Monroe Power Plant (MONPP) is located at 3500 East Front Street, Monroe, Michigan. MONPP consists of four B&W supercritical wall-fired boilers firing a blend of subbituminous coal, bituminous coal and petroleum coke and is rated for a maximum gross output of 3,280 MW. The units started commercial operation from 1971 to 1974. This cessation of coal NOPP will apply to only Unit 3 and Unit 4 at MONPP.

#### **Expected Date of Coal Cessation**

Since the release of the 2020 Rule, DTE has evaluated the feasibility of coal cessation on the units at MONPP. In November 2022, the Company filed the Integrated Resource Plan (November 2022 IRP) that proposes an accelerated retirement timeline for MONPP. Except for the factors identified below in the Notice of Change section, DTE submits this NOPP with a commitment to cease burning coal for Units 3 and 4 at MONPP by December 31, 2028 (pending Michigan Public Service Commission's (MPSC's) approval in the current contested case IRP)

#### **Method for Cessation of Coal Burning Activities**

DTE filed an Integrated Resource Plan (IRP) in 2019 that was approved by the MPSC on April 15, 2020. The 2019 IRP provided for planned operations at MONPP until 2040. DTE was initially scheduled to submit an updated IRP by September 2023 for the MPSC's review, but DTE accelerated the timeline and submitted a new IRP on November 3, 2022.

The November 2022 IRP provides a detailed analysis of DTE's long term generation plan, which includes retirement of MONPP Units 3 & 4 by 2028. DTE has submitted this NOPP to reflect the company's commitment to the new IRP. Upon receipt of a final order by the MPSC approving or denying the IRP, DTE will submit applicable documentation in the annual reports as required in 40 CFR 423.19(f)(3) to either withdraw the NOPP or update information submitted in this initial notice.

#### **Regulatory Approval of Coal Cessation**

This NOPP represents a formal submittal to a regulatory body regarding DTE's intentions to meet the 2020 Rule's cessation of coal compliance subcategory for MONPP. 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 November 2022 IRP was submitted to the MPSC and is currently awaiting approval. Therefore, DTE's current IRP approved in April of 2021 does not contain information set forth in this NOPP. If approved by the MPSC, the November 2022 IRP will qualify as the regulatory approval required by the 2020 Rule to qualify for the cessation of coal combustion compliance subcategory. Upon its approval, a copy of the November 2022 IRP will be submitted to EGLE to supplement this notice. Should the IRP not be approved as proposed, DTE will rescind or modify the NOPP accordingly.

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 combustion compliance subcategory at MONPP. More supporting documentation such as the November 2022 IRP and future rate cases 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 MONPP Units 3 and 4. A timeline with milestones can be found as Enclosure 2.

Action	Estimated Timeline (Months) or Target Date
	Unit Retirement
Submit IRP	November 3, 2022
Final approval of IRP	October 30, 2023 (est.)
Approval from grid operator to cease coal combustion	Expected 2024-2027
Cease Coal Operation	12/31/2028
System Decommissioning (steam system draining, evacuate hydrogen from steam turbine generator, ash cleaning, fuel/lubricating/hydraulic oil removal, transformer oil removal, etc. Coal pile and coal handling systems remain to support Units 1 and 2)	6
Regulated Materials Assessment	3
Specify, Bid, and Award: 1. Abatement and/or Demolition Contract(s)	6
Environmental Abatement (if required)	6-12
Demolition (Units 3 and 4 will likely retire and remain in place until all four units are demolished)	N/A

## **Notice of Change to Initial NOPP**

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 – An updated IRP was recently submitted to the MPSC and is pending approval. Changes to the November 2022 IRP as a result of the regulatory approval process 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 ELG Rules 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. Accordingly, the draft Rule was proposed by EPA on March 29, 2023. The proposed rulemaking or other potential future regulatory changes could impact DTE’s ELG compliance strategy including the use of the VIP compliance subcategory and associated NOPP process.
4. Grid reliability, resource adequacy, and/or supply reliability challenges that would require a delay in retirement to address and maintain safe and reliable electric service for customers.
5. Other Factors to Be Determined – Other factors including, but not limited to, legal challenges of EPA’s ELG rules or rulemakings conducted by future 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(h)(3) if changes to the NOPP or transition to other compliance options pursuant to 40 CFR 423.19(o) are needed.

