

June 27, 2025

Ms. Lisa Felice Executive Secretary Michigan Public Service Commission 7109 W. Saginaw Hwy., 3rd Floor Lansing, MI 48917

RE: Case No. U-21538 – In the matter, on the Commission's own motion, to open a docket for certain regulated electric utilities to file transportation electrification plans and for other related matters.

Dear Ms. Felice:

Enclosed for electronic filing in the above-captioned case, please find Consumers Energy Company's Transportation Electrification Plan Annual Progress Report 2025.

This is a paperless filing and is therefore being filed only in PDF. I have included a Proof of Service showing electronic service upon all intervenors from Case No. U-21585 (Consumers Energy Company's 2024 Electric Rate Case) and all parties who filed Initial Comments or Reply Comments in Case Nos. U-21492 and U-21538.

Sincerely,

Spencer A. Sattler Phone: 517-474-6638

Email: spencer.sattler@cmsenergy.com

cc: Parties per Attachment 1 to Proof of Service









CONSUMERS ENERGY Transportation Electrification Plan Annual Progress Report 2025

Case No. U-21538 June 2025

Table of Contents

BACKGROUND	4
TEP EXECUTIVE SUMMARY & STRATEGY	7
TEP IMPLEMENTATION	12
TEP CUSTOMER PARTICIPATION & COSTS	28
TEP MANAGED CHARGING RESULTS	43
TEP LOOKING FORWARD & STAKEHOLDER FEFDBACK	46



Digital residential customer campaign sample

Table of Figures

Figure 1: Residential Customer Costs of Home Charger & Installation	28
Figure 2: Level 2 Site Host Category Participation (Pilot + Permanent Program)	30
Figure 3: Public L2 Site Project Costs Per Dual-Cord L2	31
Figure 4: Public Level 2 Sites by Location & Type	32
Figure 5: DCFC Site Project Costs	33
Figure 6: DCFC Site Make Ready Costs	34
Figure 7: Fast Charging Locations	35
Figure 8: PowerMIFleet Assessments by Customer Sector	36
Figure 9: In-Person Customer Education & Outreach Locations Overlaid on MIEJ Screen Map	40
Figure 10: EV Charging per Category & Time Block	43



Kids Food Basket and the Consumers Energy EV team celebrate the delivery of their new electric van to deliver nourishing meals to kids in need.

BACKGROUND1

Consumers Energy (Consumers Energy, CE, or the Company) began the first phase of creating the Company's Transportation Electrification Plan (TEP) via the PowerMIDrive pilot, which was approved by the Michigan Public Service Commission (MPSC) in Case No U-20134. PowerMIDrive subsequently launched in June of 2019, with a goal of at least 70% off-peak load management for residential customers, and to provide early learnings regarding public charging infrastructure. The Company's TEP formation was further enhanced via the addition of the PowerMIFleet pilot approved in Case No U-20697, and efforts to optimize electric loads from fleets to at least 80% off-peak began in June 2021. The Company believed that the higher level of off-peak charging was possible for PowerMIFleet based on the learnings and promising early results of PowerMIDrive.

The PowerMIDrive and PowerMIFleet pilots were further refined in Case No U-20963, with the goal of moving closer to permanent programs. PowerMIDrive added the use of advanced metering infrastructure (AMI) for targeted outreach and load management verification. Furthermore, PowerMIDrive shifted the focus of public Level 2 (L2) charging infrastructure to destination charging to increase off-peak loads, and multi-dwelling units (MDUs) to enhance customer access and equity. PowerMIFleet added capital funds for fleets serving income qualified customers and disadvantaged communities, again to improve customer equity regarding transportation electrification. These enhancements were approved by the Commission in December 2021.

The first official TEP filing (under the heading of "Consumers Energy 2022-2030 Transportation Electrification Strategic Plan") was included in Case No U-21224. In January 2023, the Commission approved the Company's proposal to make the PowerMIDrive Residential program permanent, including the MDU component, and to add community charging rebates to the PowerMIDrive public infrastructure pilot. The community charging pilot was proposed by the Company to further increase equitable access to off-peak charging by customers.

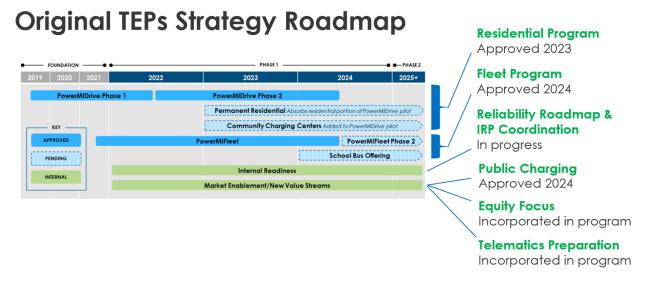
Finally, in Case No U-21389, the Company proposed making both PowerMIFleet and the PowerMIDrive Public programs permanent based on the continued pilot refinements and learnings of the past four years. In March of 2024, the PowerMIDrive Residential, PowerMIDrive

4

¹ See <u>0688y00000EFQgtAAH</u> for the Company's 2024 TEP report. See <u>0688y000008L9UaAAK</u> and <u>0688y000008KyQSAA0</u> for the 2023 PowerMIDrive and PowerMIFleet annual reports. The original TEP strategy from 2022 was provided in <u>0688y000002IGMIAAM</u>. Finally, additional reports from the pilot phases (2022-2020) leading to the TEP are also available at <u>0688y00003NM62AAG</u>, <u>068t000000NieAVAAZ</u>, and <u>068t000000D3t95AAB</u>. All of these regulatory filings show the Company's consistent focus on optimizing the grid and increasing charging infrastructure via strategic locations to benefit customers.

Public, and PowerMIFleet programs were authorized by the Commission, creating the first comprehensive utility EV load management program approved without legislative mandates.

The goals laid out in the original TEP filing were achieved, as summarized in the graphic below excerpted from the original TEP filing.²



The strategic roadmap objectives in the Company's first TEP have all been approved and focus on equitable charging access such as the up to \$1,000 income-qualified residential rebate, multifamily rebates, community charging rebates, and workplace charging rebates, in addition to PowerMIFleet's strategic focus on fleets serving income qualified and disadvantaged communities, non-profits, educational institutions, government agencies, and small and medium businesses.

Telematic preparation is also being achieved given the Company's focus on Level 2 charging, in addition to some long-duration direct current (DC) and Level 1 rebates, by focusing on key market segments that are likely to be off-peak. All of these use cases focus on situations providing 3 hours or more of plug-in time where telematics can be meaningfully engaged in the future.

In 2026 the Company will file an updated TEP, and annual reports thereafter will utilize the TEP reporting requirements published by the MPSC. This is the last annual update utilizing the format developed during the pilot phase of our TEP programs.

5

²See page 19 of Exhibit A-152 (JAM) in Case No. U-21224, which is page 2937 of 2942 in the PDF: <u>0688y000002IGMIAAM</u> (<u>site.com</u>)



Consumers Energy's TEP programming was featured at the anchoring panel of the 2024 Peak Load Management Alliance EV Summit



Consumers Energy's TEP programming was recognized by EPRI for contributions in planning for millions of EVs on the road

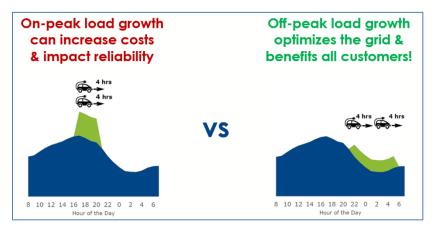
TEP EXECUTIVE SUMMARY & STRATEGY

Governor Whitmer and the State of Michigan have set a goal of two million EVs in Michigan by 2030, and in support of Michigan's goal and the size of the electric territory the Company serves, Consumers Energy set an ambition to be ready to serve one million of those EVs. The Company's TEP is the strategic document that roadmaps how serving one million EVs (and more beyond 2030) will be achieved. Supporting the TEP are three essential customer load management programs (PowerMIDrive Residential, PowerMIDrive Public Charging, and PowerMIFleet), in collaboration with coordinated planning via the Company's reliability road map and integrated resource plan (IRP). All these TEPs elements are critical to meeting the goals while optimizing EV charging to the benefit of all customers.

Within this context, the Company's' TEP is focused on three primary strategies:

1) Load growth at the right time to benefit reliability and cost for all customers

Not all customers are EV drivers, but the goal of the Company's TEP continues to be that all customers should benefit from the EV programs by maximizing off-peak charging.



On-peak charging can dramatically increase distribution system needs at the service and distribution circuit transformer level. For example, most residential loads peak at near 10 kW, and even L2 charging can double that on a 50-amp circuit (an additional 9.6 kW), or potentially even triple such peak loads if

multiple EVs in a household are charging or a more powerful 100-amp circuit L2 is utilized (an additional 19.2 kW). Given the growth trends of EVs, it is easy to imagine how reliability concerns and infrastructure replacement could occur near the grid edge with distribution infrastructure that was constructed to serve customers in a pre-EV era.

Without EV load management programs, most customers will pay no attention to onpeak time periods (presently 2 PM to 7 PM weekdays and likely shifting later over time as more solar generation is added to the grid) when charging. The Company knows this because in the spring of 2025 our AMI data analysis showed just 497 of the 39,950 EVs in the Company's electric territory enrolled in Rate 1050 (Nighttime Savers) without rebate and incentive engagement. That equates to a mere 1.2% of EV customers, consistent with data trends from the last several years, and thus relying on time of use (TOU) rates alone is not sufficient to incentivize residential EV load management. Furthermore, in public settings time-of-use (TOU) rates alone for L2 infrastructure made less impact than when combined with specific use cases (e.g. destination locations like hotels) as noted in the annual reports throughout the pilot phase of PowerMIDrive, because the cost differential for charging is relatively low. This is why the PowerMIDrive Public program now exclusively focuses on TOU rates plus strategic off-peak use-case locations like workplaces for the morning hours, and community charging, multifamily, and destination charging for the overnight and weekend hours.

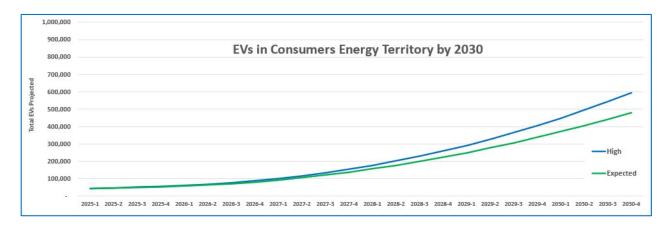
With EV load management programs more kilowatt-hours (kWh) can flow through the same infrastructure, which not only reduces reliability risks at the grid edge but also lowers costs for all customers by optimizing energy usage and infrastructure, while helping to avoid or delay local system upgrades. The off-peak charging results for all charging categories are summarized in the table below. Permanent TEP programs achieved nearly 96% off-peak charging and still maintained an impressive off-peak percentage close to 90% when direct current fast charging (DCFC) loads were included.

EV Customer Program Category	On-Peak 2PM-7PM	Off-Peak 7AM-2PM 7PM-11PM	Super Off-Peak 11PM-7AM & Weekends	Total Off-Peak by Category
Residential Single Family	2.1%	6.6%	91.3%	97.9%
Community Charging	21.6%	33.8%	44.6%	78.4%
Multifamily	18.3%	35.2%	46.5%	81.7%
Total Residential	2.6%	7.4%	90.0%	97.4%
Destination L2+L1	20.6%	36.3%	43.1%	79.4%
Fleet & Workplace	8.9%	40.8%	50.3%	91.1%
Original Pilot: DCFC	24.5%	35.2%	40.3%	75.5%
Total Commercial	20.1%	36.8%	43.1%	79.9%
Permanent Programs	4.1%	13.9%	82.0%	95.9%
Permanent & DCFC Pilot	10.4%	20.5%	69.0%	89.6%

2) Encourage and prepare for EV adoption at scale

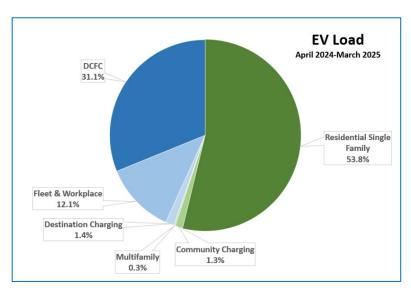
EV adoption is viral, with the most likely customers to buy or lease an EV being customers who live near someone with an EV. For example, residential distribution circuits that served three EVs near the start of the pilot may now be serving 17 or more EVs. Thus, while seasonal EV sales will vary, it is prudent to remain focused on the long term given how quickly EV adoption has been occurring and the potential for concentrated distribution level circuit impacts.

EV load growth has been at or above the "500K EV" by 2030 EV scenario utilized in the 2021 Integrated Resource Plan (IRP), annual TEP related reports, and prior electric rate cases. While the Company continues to prepare the TEPs to optimize load for one-million EVs by 2030 in support of the State's goal, and strongly supports EV adoption and Michigan's automotive manufacturing economic strength, EVs on the road are trending slightly lower than the prior approximate range of 630K EVs (i.e. the McKinsey projection from 2023) and the Company's prior 500K EV (2021 IRP projection) by 2030.



The latest data from the Secretary of State indicates that a range closer to 600K to 470K EVs by 2030 is more likely in the Company's territory. Nonetheless, those EVs are driving more miles per year due to improving public infrastructure, more EV models are entering the market (e.g. SUVs, crossovers, and trucks) that are using more kWh per mile, and the Company's electric territory continues to be a destination for many EVs that reside outside of our electric territory (e.g. travelers from the greater Chicago, Detroit, and Toledo metros) and to enable EV travel into the upper peninsula. Thus, total EV load growth, which is what truly matters for margin analysis and TEP program funding, remains solidly on track (see the financial graphic in following subsection).

Beyond EV adoption levels, residential and commercial charging continues to proportionately evolve. The Company's latest data shows a near 55/45 split between residential charging in green, and commercial charging in blue (up from approximately 70/30 in 2024, and 80/20 in 2023). The larger proportion of commercial charging is driven by the rapidly growing use of public fast charging (DCFC) as customers drive their EVs longer distances to enjoy the abundance of tourist destinations in our electric territory.



Near term, the Company believes that additional incentives are still needed to bring fast-charging infrastructure to more rural and underserved communities and has proposed a limited window of funding for a \$50,000 rebate per 150 kW port, in communities where four such ports do not exist across at least two different host sites. Knowing that a fast-charging site exists within your community is important to spur continued EV adoption via charging confidence, while also enabling travel to and

through those communities by visitors. The rapid growth in fast charging clearly indicates that the infrastructure is valued and utilized by customers in the areas served.

As a planning estimate, utilizing the ratio of one 250 kW fast charger per every 85 EVs, and adoption trending between 470K and 600K EVs by 2030, the Company projects that approximately 1,400 to 1,700 EV service requests of 1 MW or greater could occur by 2030. With the near two-year timeframe to design a new service, procure and install make-ready equipment, and energize a site, we are taking prudent action now in preparation for forthcoming EV service requests by collaborating with our supply chain and low voltage distribution planning teams. We also encourage fast-charging developers and large fleet planners to proactively reach out to us to begin project specific planning, including through initiatives such as ERPI's GridFAST³.

Circling back to the residential sector and the Company's focus on equitable access, at least one out of three residential customers may not live in a single-family home or be able to install L2 charging at their residence. The need for alternative charging locations in the future is very real, and access needs for workplace charging, community charging, and multifamily charging are expected to increase dramatically.

For example, the Company's viewpoint is that there will be a near 1-to-1 ratio of L2 chargers and light duty EVs, with approximately 2/3 of those being private at residences and fleet locations, and 1/3 of EV drivers seeking or relying on public L2. Utilizing the current EV growth rate projections, this means approximately 155,000 to 198,000 L2 plugs in equitable access and public locations may be needed in the Company's territory by 2030. Again, we believe that long-duration and equitable access locations like workplace, multifamily, community charging, and destination charging are where these L2 should be prioritized by TEP programming to optimize charging load. DCFCs support EV adoption and the continued societal benefits that come with it.

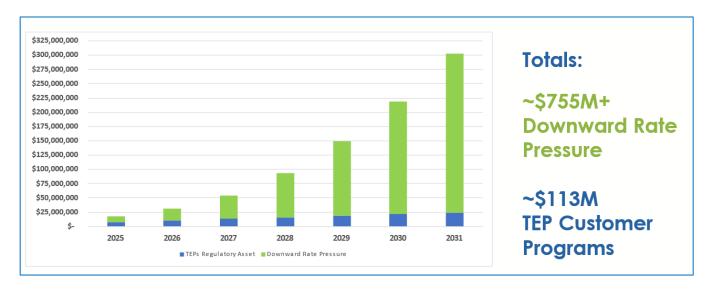
Projected Number of Plugs Needed			
EVs	1,000,000	600,000	470,000
Residential Single Family L2	520,000	312,000	244,000
Equitable Access & Public L2 Multifamily, Community Charging, Workplace, Overnight Destination	330,000	198,000	155,000
Fleet L2	150,000	90,000	71,000
DCFC (1 MW sites)	11,800 (2,900)	7,100 (1,800)	5,500 (1,400)

3 -

³EPRI's collaborative interface can be found at: <u>GridFAST</u>.

3) The additional margin from EV load growth will continue to pay for EV load management programs while also creating downward rate pressure for all customers

Consumers Energy is fully convinced that EV load growth at the right time presents a unique opportunity where a portion of the additional margin from EV load growth is easily able to fund EV load management programs and accelerate charging infrastructure developments, while preserving margin for downward rate pressure benefiting all customers. In fact, utilizing the expected scenario for EV adoption, the projected investment in EV customer load management programming recovered via the regulatory asset is approximately \$113 million, which is greatly outweighed by the downward rate benefit projected to be more than \$755 million of remaining EV load margin between now and 2031. Thus, EV programs clearly pay for themselves and are not paid by non-EV driving customers. Moreover, all customers continue to benefit from EV load growth and continued electrification should be encouraged.



Using the three strategic principles above, Consumers Energy's TEP is focused on scaling programming and planning for key market segments in support of Michigan's EV goals. To date, even with efforts that do not include direct control, off-peak load management has achieved breakthrough results benefitting all customers. The Company's EV load management programs have achieved greater than 95% off-peak charging between April 2024 and March 2025, which is best in class for utilities and well beyond the original pilot goal of 70% off-peak charging.

The Company is also preparing for future technology developments, such as active charging management via telematics. All market segments in which active managed charging is likely to be acceptable to the customer are covered by our approved programs in the TEP. Furthermore, future technologies such as active managed charging and bidirectional power flows are not possible if a vehicle is not plugged in due to a lack of infrastructure, and our customer programs are working to optimize the likelihood of such opportunities.

TEP IMPLEMENTATION

The section below summarizes the implementation strategies taken by the Company to continue to optimize EV load growth, across all key market segments for charging, for the benefit of all customers.

Residential Single-Family Rebate & Incentives

The majority of EV charging occurs at home, and most residential EV drivers utilize L2 chargers, which can significantly impact residential peaks. Moreover, residential EV loads continue to be the largest kWh segment in the TEP. Thus, it is critical that we engage a significant proportion of residential EV drivers to maintain loads within residential design standards and optimize charging behaviors. To create an attractive load management program, Consumers Energy offers a combined offering of:

- \$500 (up to \$1000 for income qualified customers) home installation rebate for any UL, EnergyStar certified level 2 charger on a 240-volt circuit of 50 amps or less. This rebate typically covers up to half of the installation cost, thereby drawing customers in to discuss optimal rates and charging times to save money and optimize the grid.
- \$10 monthly incentive for enrollment into the Smart Charging Incentive Program avoiding on-peak charging (over 12 months and thus \$120 potential total incentive). This behavioral reinforcement over all four seasons of weather creates a gamification challenge to save and earn additional money, while also giving the customer confidence that off-peak charging is possible year-round. We continue to see customers maintain their off-peak charging after graduating from the program, which also avoids ongoing operational costs for incentives.

To be eligible for one, or both, of the rebate and incentive offers above, a customer must:

- Be a current full-service Consumers Energy electric customer
- Own, lease or have an EV on order
- Agree to enroll in a year-round TOU rate at home, with Nighttime Savers being the recommended option (Rate Code 1050)
 - Program weekday charging to occur during super off-peak timeframe (11PM-6AM) and avoid charging during on-peak times (2PM-7PM)

As Consumers Energy seeks to ensure that grid benefits are optimized while the EV market is rapidly expanding, the Company's residential program continued to analyze home EV charging patterns of participating customers. The team focused education efforts and customer awareness of the benefits a year-round TOU rate and off-peak charging can offer an EV driver (namely, approximately \$1.30 per e-gallon equivalent), with an emphasis on 11 PM or later start time for charging to further assist all customers via super off-peak charging.

In 2025 we also began working with customers to voluntarily change their start time based on their daily driving habits. For example, a lower mileage driver or a plug-in hybrid owner may be willing to program their charging to start at 1AM or 2AM instead of 11PM. This helps create load diversity and decreases ramp rates at no additional cost to the program. Only a few months into this voluntary initiative, over 300 EV drivers have already modified their charging start time.

The Company continues internal collaboration with the Low Voltage Distribution Planning (LVDP) team to track residential transformers, looking for potential impacts where the electric grid supports multiple residences with home chargers. Analysis of residential participants continues to show no transformer reliability challenges from participating customer EV charging.

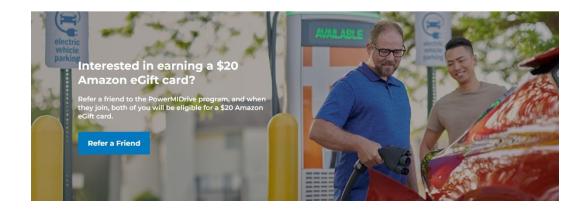
The fact that no residential customers that are utilizing a single 50-amp outlet have, to date, required make ready work on the Company's side of the meter is evidence supporting our 9.6 kW residential design standard for EV charging. These experiences were the basis for the decision to utilize a single National Electric Manufacturers Association (NEMA) 14-50 outlet as the residential standard in the permanent residential program.

However, we also know that the vast majority of EV drivers will continue driving EV and add more EVs to their household as their internal combustion engine (ICE) cars age out. Without further proactive strategy, such homes are likely to install additional charging circuits that could exceed residential neighborhood design standards as adoption continues to scale. To address this challenge, the team has begun work to implement the recently approved rebate of up to \$500 for a UL listed dual cord L2 or splitter technology in which two or more EVs can charge from a single NEMA 14-50 outlet. This benefit also addresses ramp rates by spreading the load from multiple EVs across a greater time rather than having two L2 begin charging simultaneously (e.g. 9.6 kW charging over 4-6 hours is much better than 19.2 kW from two L2 charging over 2-3 hours).



PowerMIDrive team members test a power-sharing residential L2 that utilizes a single NEMA 14-50 outlet – a solution that reduces customer costs and gid impacts of homes with multiple EVs

Banner ad on the EV webpage for the new Referral Rewards program



Furthermore, we know that EV adoption is viral and the customers most likely to drive an EV are those who know someone with an EV. Customers in our programs also consistently report a 70 or greater net promoter score (NPS), which is incredibly high for utilities. Thus, in 2025 we also began implementation of a referral program, in which the referring customer and the referee upon enrolling in PowerMIDrive each receive a \$20 gift card. This viral marketing approach helps to grow program participation and avoids email marketing clutter. In less than a month the referral program has already brought 28 potential new customers into the application process.



Regarding the popularity and efficacy of residential program participation, the key is the combination of rebates that get customers to participate in off-peak charging and an AMI-based incentive that positively reinforces off-peak charging behavior through all four seasons. The PowerMIDrive Residential strategies continue to show world class results, with single-family homes charging at 95% or greater off-peak and no system issues with over 8,200 EVs in the program. Rebates and behavioral incentives are providing the results needed to optimize residential EV charging as the sector continues to grow rapidly.

Sample of email communication sent to customers with AMI data indicating a high likelihood of EV ownership

Multifamily Property L2 Rebates

Approximately one of three Consumers Energy customers call a multifamily property home, and our TEP includes customer programming to ensure equitable access to off-peak charging for these residents. Multifamily properties with five or more residences typically do not have access to or the ability to install a private-use L2 for their EVs like single-family residents can. Without onsite or nearby L2 charging options, multifamily customers are more likely to rely on fast charging, which is usually similar in cost to gasoline and thus less likely to result in cost savings from driving EV. Thus, PowerMIDrive's multifamily charging rebate component is designed to incentivize multifamily property owners to invest in EV charging as an amenity for residential tenants.

In 2023, Consumers Energy launched multifamily property charger rebates as a permanent program



PowerMIDrive Multifamily Property Charging in Wyoming, MI

offering. To ensure optimal grid benefits are achieved, the program provides a \$7,500 rebate for at least two L2 charge ports on a maximum 100-amp circuit, thereby keeping EV charging loads similar to our single-family program. The chargers are required to be separately metered and enrolled on CE's commercial TOU rate, which offers a lower cost of electricity during the off-peak hours. To further encourage off-peak charging at multifamily properties, PowerMIDrive provides signage and educational materials to the property, and site hosts receive a \$20/monthly bill credit for the first 12 months the chargers are installed if 80% or greater of charging avoids the peak window of 2pm-7pm Monday through Friday.

As of April 2025, a total of 48 L2 rebates have been paid to multifamily properties across Michigan. Of this total, 23 rebates were paid during the original and extended pilot offering, 23 rebates were paid under the under the permanent program offering, and 2 rebates were paid as part of our Enel X swap-out efforts.⁴ An additional 54 rebates are committed to 26 MDU locations around the state for in-progress projects, illustrating rapid growth and interest in the program.

We are happy to report that nearly all multifamily property participants under the permanent program have achieved at least 80% off-peak charging each month since installation was completed. Only one site host exceeded the on-peak charging limit in a single month, and with coaching from the EV team there have been no recurrences.

⁴ In the Fall of 2024, Enel X abruptly announced their exit from the U.S. market, which would have rendered commercial L2 unfunctional. Thus, PowerMIDrive assisted pilot program participants who were required to use this vendor to update the L2 and maintain equitable customer access.

Community Charging L2 Rebates

Sometimes it is not economically feasible to install L2 overnight charging within multifamily residences, or for low-income communities to install at-home charging within a single-family residence. In such cases, community charging can offer a viable alternative if located near such properties where overnight and weekend parking is permitted. Thus, PowerMIDrive's community charging rebate is designed to encourage municipalities and business customers to invest in L2 charging for their communities in public parking or curbside locations that are within 1-3 walkable blocks of a multifamily property or underserved residential neighborhood. The goal of this program offering is to further support equitable access to charging for multifamily residents and members of the community without access to home charging for their electric vehicles.



To ensure optimal grid benefits are achieved, the \$7,500 rebate provides several eligible installation options, including at least two L2 charge ports on a 100-amp circuit or less.

Alternatively, as a bring your own charger option, two NEMA 14-50 outlets designed for outdoor continuous use, or at least five L1 charge ports, are allowed if installed on a maximum 100-amp circuit. Thus, our community charging program allows for a bring-your-own-cord (BYOC) approach that other program categories have also expressed interest in for cost-savings. The chargers must be separately metered and

enrolled on CE's commercial TOU rate to encourage off-peak charging when the cost of electricity is lower.

As of April 2025, a total of 76 community charging rebates have been paid to community charging locations around the state. This total includes 43 rebates classified as community charging from the original public L2 pilot, 12 rebates paid for the community charging pilot,

and 21 rebates paid as part of the Enel X swap initiative. Currently, an additional 40 rebates are committed to 16 community site hosts for projects in progress, illustrating strong growth potential as many more communities need charging access.



Community Charging in Mt. Pleasant serves nearby apartments and student campus housing

Destination L2 & L1 Rebates

Consumers Energy's electric territory covers the majority of Michigan's lower peninsula, and many popular tourist destinations for Michiganders and tourists coming from out-of-state. Thus, PowerMIDrive's destination L2 and L1 charging rebate program is designed to improve charging infrastructure accessibility in locations where EV drivers are most likely to charge for longer off-peak time periods when traveling. Lower power destination charging also helps supplement fast charger locations that can see significant increases during specific seasons and holidays.

To ensure that optimal grid benefits are achieved, the permanent program provides a \$7,500 rebate for at least two L2 charge ports on a circuit of 100-amps or less. At destinations where travelers are likely to park their EV for 48 hours or longer, host sites can also receive a \$7,500 rebate per five level one (L1) charge ports on a 100-amp circuit.

The value of L1 charging is often overlooked, but at long term parking locations like airports and harbors, it can serve a multitude of EVs while avoiding idling challenges from L2s that usually finish charging in less than 8 hours and tie up that plug for the next 40 hours or more. Our first long-duration L1 locations are anticipated to be installed later this year.



PowerMIDrive Destination Charging at a hotel in Spring Lake

A separate meter for the chargers will be required and enrolled on CE's commercial TOU rate, which offers a lower cost of electricity during the offpeak hours. Similar to our efforts during the pilot phase, participants will be educated on the benefits of encouraging destination guests to charge during the off-peak and weekend hours. Participants will maintain their ability to set pricing and accessibility to reflect their individual business needs.

To date, including the pilot phase and Enel X swaps, 117 destination L2 rebates have been awarded to host sites statewide. This rebate category is increasing in popularity, with multiple locations in the rebate queue for completion in the next 12 months.

Workplace L2 Rebates

Similar to home, many people spend a large portion of their week at work. Moreover, for those without access to L2 charging at home, workplaces offer a great opportunity for charging access. We anticipate that residential and workplace charging will be the two largest targets for optimized charging going forward, as they are prime locations to spread and manage load over a longer time period that will not impact the customer.

For example, the typical commute is often 40 miles or less, meaning that L2 charging can be complete well before the current afternoon on-peak time period, and as more solar comes online we can consider spreading that load further into the prime solar generation hours. Equity benefits also exist with workplace charging, because it can supplement, or in some cases substitute for, charging at home (be it single or multifamily) if such an installation is not possible or economically feasible for the customer. For all these reasons, workplace charging is an important market segment for Consumers Energy's TEP as we look to future load management opportunities.

Similar to the other commercial charging programs, to ensure that optimal grid benefits are achieved, the permanent program will provide a \$7,500 rebate for at least two L2 charge ports on a maximum 100-amp circuit. A separate meter for the chargers will be required and enrolled on CE's commercial TOU rate, which offers a lower cost of electricity during the offpeak hours.

However, given that some workplaces are adjacent to neighborhoods or multifamily housing, we recognized that a unique opportunity may exist that can aid equitable charging access. Thus, if the participating workplace agrees to allow access, and meets qualifications to serve as a community charging location (i.e., located within 1-3 walkable blocks of a multifamily property or underserved residential neighborhood), the rebate amount per two L2 chargers will increase from \$7,500 to up to \$10,000. In such cases, the workplace may choose to mandate specific overnight and weekend charging hours for the public, so as not to interfere with employee access to the charging stations during their work shifts.

To date, 174 workplace rebates for L2 charging have been granted, which includes sites classified as workplace from the original PowerMIDrive pilot, Enel X



PowerMIFleet combined Workplace & Community Charging in Flint

swaps, and PowerMIFleet pilot phase leading up to the permanent program. One site host in Flint has received the enhanced workplace plus community charging rebate to date, and additional sites are considering this arrangement in their plans. Currently, an additional 60 rebates are committed to 27 workplace locations for projects in progress around the state.

The load from workplace charging is included in the results for fleets via the PowerMIFleet program and continues to trend upwards with encouraging results. Presently we are achieving over 91% off-peak charging across workplace and fleet.



Workplace charging at Jackson College serves employees & commuting students

PowerMIFleet Rebates and Assessments

In the transportation sector, fleets tend to drive the most miles and thereby produce proportionately more emissions compared to other ICE vehicles. Thus, when fleets switch to electric, they can achieve outsized emissions reductions by proportionately more kWh per EV than a typical residential driver. Nonetheless, this transition is not easy given the technical challenges of switching to a new fuel type, especially for fleets with fewer resources such as those serving in public transport, education, government, non-profit, and small to medium sized businesses. Given this challenge, and the large number of people served by these fleets, the PowerMIFleet program was created to focus on helping those sectors reduce operating costs, eliminate emissions, and optimize the grid, to produce benefits for everyone.

Under the permanent program offering, with rebates as follows:

- \$7,500 per two L2 charge ports
- \$15,000 per long-duration DC charger of 50kW or less (mirroring L2 load shapes, but at a higher power to account for larger batteries within some fleets)

Like other customer programs within the TEP, chargers installed and rebated through PowerMIFleet must be separately metered and enrolled on the commercial TOU rate to encourage off-peak charging. A total of 137 L2 rebates and 11 long-duration DC rebates have been awarded to date, supporting 240 electric vehicles deployed to fleet organizations serving people across our electric territory.

Furthermore, when needed to help overcome technical challenges and ensure that the right EVs are utilized in the optimal use cases, PowerMIFleet has continued to partner with two fleet electrification assessment consultants to provide a customized, full-service assessment report to selected participants. As of March 31, 2025, a total of 61 fleet assessments have been completed with an additional four customer fleet assessments in progress. Anonymized assessments are then published on the PowerMIFleet website.

Going forward, PowerMIFleet will seek to partner with the customer sectors that will benefit most from a fleet electrification assessment, transitioning over time from light-duty to newer and more novel use cases for medium and heavy-duty EVs, as well as off-road, marine, and potentially aviation use cases. Thus, the frequency of fleet assessments is likely to decrease, but they remain a useful tool especially for organizations seeking supplemental grant funding.

To date, PowerMIFleet continues to trend upward achieving offpeak results of greater than 91%.



The Rapid Transit has begun the electric fleet transition by deploying 12 Ford E-Transit Vans



PowerMIFleet Electric School Bus Ribbon Cutting Ceremony with Jackson Public Schools and Highland Fleets

Jackson Public
Schools deployed 21
electric school
buses, the largest
school bus project
to date with
PowerMIFleet



PowerMIFleet Enhanced Rebates for Income Qualified Fleets

As part of the pilot phase of PowerMIFleet, Consumers Energy received a one-time fund of \$1.6M to support fleet electrification for organizations whose vehicle fleet serves an incomequalified community. As of April 2025, the EV team identified a total of 12 service organizations to support via enhanced rebates, with planning for additional outreach underway. Organizations include Dial-A-Ride organizations with Rides to Wellness programs for senior citizens and veterans, rural and urban school districts, and non-profit organizations who deliver meals to children in impoverished communities around the state. To date, ten organizations have deployed their new electric fleet vehicles, and the remaining two organizations are in the process of coordination vehicle delivery and driver training with our partner organization, Hoekstra Transportation.

We would like to thank the MPSC for their support in allowing us to provide this funding to worthwhile organizations around the state, connecting members of the community with emissions-free transportation, reducing operational costs via electrification, and providing the experience of riding and driving an electric vehicle from Michigan OEMs. The enhanced rebate funding via the \$1.6M has been transformational for these agencies and non-profits in addition to the income-qualified communities they serve.

For example, Otsego County Food Pantry received a Ford E-Transit Cargo Van and L2 charger to support their food delivery and community services around the region. A ribbon cutting and food drive event to "jam the van" was celebrated in April 2025. Otsego County Food Pantry staff stated, "We are so excited, grateful, overwhelmed and amazed! Thank you, Consumers Energy!"



PowerMIFleet Income Qualified Community Fleet Vehicle in Gaylord made possible by the enhanced rebate program

Given the success of PowerMIFleet at optimizing the grid, less make-ready has been needed to date for the pilot phase projects still in the works. Thus, in the 2024 electric rate case the Company proposed utilizing any remaining make ready funds for additional income qualified fleet projects. The MPSC approved that request in early 2025 and the team is now working to deploy approximately \$3M in additional enhanced rebates for fleets serving income-qualified customers. We are excited to see the collaborative projects that are in the works for deployment later this year and into 2026!

PowerMIFleet partnered with Grand Rapids to deploy a car share program helping income-qualified customers





L2 charging infrastructure being installed for Kids Food Basket and made possible via the enhanced rebates for income-qualified fleets

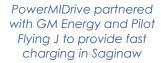
DCFC Rebate Pilot

PowerMIDrive's DCFC rebate component is presently a continuation of customer projects underway from the pilot phase of the Company's EV initiatives as we work to wrap up the 137 fast charging projects awarded. The DCFC rebates were designed to help create the start of a network of fast charging infrastructure, primarily along four-lane highways throughout the Company's electric service territory. However, much work remains to bring fast charging access to more of our rural and seasonal travel communities in support of customer travel and tourism impacts.

By incentivizing initial investment in DCFC infrastructure along such major expressways and travel corridors, benefits are already being realized by the broader community of EV drivers traveling within the state of Michigan. Convenient fast charging is a significant factor in ensuring EVs meet the needs of customers on longer-distance travel, and thus for EV adoption as well since consumers expect to be able to road-trip with their vehicle.

DCFC site hosts participating in the PowerMIDrive pilot are educated on the benefits of providing fast chargers to attract more traffic to their respective locations and supporting Michigan's economic development as our OEMs continue to electrify their vehicle offerings. Like public L2 sites, DCFC site hosts also maintain the ability to set pricing to reflect individual on-site needs. However, unlike public L2 locations, all DCFC rebate recipients implement a fee for charging and fast charging is usually more expensive per kWh than L2s that implement a fee.

The Company is pleased to report that a total of 88 of the 137 PowerMIDrive DCFC pilot sites are now operational across CE's territory to date. Of the remaining sites in progress, 24 are National Electric Vehicle Infrastructure (NEVI) sites focused on expanding fast charging to every 50 miles along major four-lane highways, and 25 sites have been selected by our team to help increase fast charging infrastructure in remaining areas. When the pilot is complete, the 137 fast charging rebates represent an important initial step toward the more than 1,400 fast charging locations projected to be needed by 2030. In particular, we believe that rural and seasonal travel communities still need incentive support to ensure the skeleton network of fast chargers is sufficient to support rapidly growing EV adoption.





Future Proofing at DCFC Pilot Sites

To help ensure the DCFC infrastructure installed allows for scalability with future EV growth and avoid rework such as replacing relatively new transformers during future upgrades, the PowerMIDrive Program was approved with approximately \$40,000 in make ready budget per DCFC rebate in the pilot. These funds are designated to utility side upgrades such as transformers and line upgrades serving the host site.



PowerMIDrive Fast Charging Rebate Site in Glennie

The cost and scope of electrical upgrades at DCFC sites are evaluated with the specification to double the minimum required initial output capacity of 150 kW in aggregate per site. Thus, a 300 kVA transformer will continue to be installed at each non-NEVI DCFC site participating in the PowerMIDrive pilot as part of the electrical upgrade work performed by the Company.

As with the Company's previous TEP partnership with the Michigan Department of Environment, Great Lakes, and Energy (EGLE) on Charge Up Michigan program funding for DCFC sites, Consumers Energy has developed a close collaborative partnership with Michigan Department of Transportation (MDOT), as Federal NEVI funding awards were announced earlier this year. Of the total 41 NEVI site awards announced across Michigan, 24 of those awards fall in the Company's electric service territory and we have worked hard to ensure that all NEVI sites can be quickly completed after NEVI contracts are finalized.



PowerMIDrive Fast Charging Rebate Site at Birch Run

We are pleased to report that all 24 NEVI sites have completed the design phase in strong support of the State goals. These sites are ready to kick off construction as soon as contracts have been executed between MDOT and the site hosts.

As each NEVI site will require four 150kW DCFC stations, make-ready infrastructure is being designed accordingly, with a 750 kVA transformer planned at each location. We are prepared to complete these projects by end of 2025 but realistically anticipate that some will be completed in 2026 due to customer schedules.

Customer Education & Outreach

With EVs rapidly growing in the early adopter phase, customer outreach and education remain a key component of the Company TEP. We know that education alone is not enough, and pairing outreach with customer programs is necessary to create opportunities for engagement about EV load and cost optimization. Thus, a multi-faceted strategy continues to be implemented to raise awareness about how off-peak charging benefits both EV and non-EV customers, the cost savings achievable utilizing TOU rates, and the public EV charging infrastructure made possible in part by PowerMIDrive.

The program team utilizes both in-person and digital channels to reach customers, raise awareness of the rebate programs, and achieve program enrollment targets, including:

- Participation in National Drive Electric Week events (September-October)
- Participation in Drive Electric Earth Month events (April)
- Trade and auto shows
- EV101 presentations at community and business organizations
- Email and direct mail outreach campaigns and newsletters
- Press releases and earned media
- Social media posts and digital media advertisements including search terms
- Radio and TV interviews
- EV-focused virtual events, conferences and panels
- Government and trade association engagement

The combination of marketing and outreach lead to over 79,662 unique visitors to the PowerMIDrive residential website where customers can learn more information online, contact an EV specialist or complete their application.

The Company's EV team, which is dedicated to leading PowerMIDrive and PowerMIFleet, reaches tens of thousands of customers each year via these efforts. Team members include the following:

- Director of Customer Transportation Electrification Planning Jeff Myrom
- PowerMIDrive Public and PowerMIFleet Program Manager Bethany Tabor
- PowerMIDrive Public Team Members Doug Reid, Paul Nicklowitz, and Scott Zenner
- PowerMIFleet Team Members Steven Harris, Jenna Brown, and Kristi Baker
- PowerMIDrive Residential Program Manager Brittany Fischer
- PowerMIDrive Residential Team Members Stacey Walkowe, Maria Mejias, Justin Stowe, Nicolas Hutchens, and Jarrod Skogen
- Community Outreach Coordinator Justin Stowe
- Education & Outreach Support Therese Vainner and Brett Porterfield
- Media & Press Coordination Brian Wheeler



PowerMIDrive & PowerMIFleet team members spoke with hundreds of customers at the 2025 auto show in Grand Rapids



PowerMIDrive team answering questions at an EV Summer Meetup in Muskegon



Media interviews get the word out to customers regarding our EV programs

TEP CUSTOMER PARTICIPATION & COSTS

Residential Single Family

As of March 31, 2025, PowerMIDrive Residential had over 7,933 EV customers, including 13 income qualified rebates in the program. These customers are participating through the up to \$500 rebate (up to \$1,000 for income qualified customers), the Smart Charging Incentive (i.e. \$10 per month of charging super off-peak for 12 months), or both.

As part of the rebate process, the program collects residential applicant documentation to validate proof of purchase and installation of an eligible Level 2 home charger. While not all participants share their cost information or may have only part of the costs documented, these findings provide valuable insight into residential L2 retrofit costs. It also highlights the need for EV ready building codes since significant cost savings are possible during the construction process, and much of the housing stock does not have a NEMA 14-50 outlet in the parking area. Based on the program participant documentation received as of March 31, 2025, the average, high and low residential customer costs are outlined in Figure 1 below.

Median Cost		Average Cost	
Charger Only	\$477	\$502	
Installation Included	\$1,125	\$1,363	

Figure 1: Residential Customer Costs of Home Charger & Installation

Some residential participants did not require an electrical contractor for installation at their home because they were existing EV owners (i.e., a benefit of having a 240V outlet already in their garage), and therefore only provided cost documentation to verify proof of charger purchase. Project costs for these customers are captured in the "Charger Only" cost line item in Figure 1.

In cases where installation was required and an electrical contractor invoice was provided, the total out-of-pocket costs were significantly higher, as outlined in the "Installation Included" cost line item in Figure 1. Furthermore, the Company has received numerous inquiries from customers seeking general guidance on the scope of work required to install a Level 2 charger at home or looking for a referral to local electricians experienced with home charging station installations in their area. Based on this feedback, CE enhanced the Company's electric vehicle webpages to provide the resources such as a NEMA 14-50 outlet specifications so that customers feel more confident about charging their EV overnight at home.

Consumers Energy's insights from this data are that the standardization of a NEMA 14-50 outlet, assistance locating an electrician, and the rebate to assist with the costs of installation by a

qualified electrician is a clear benefit to customers and will help draw them into participating with the Company's permanent residential proposal. Moreover, the Company is now working to include power-sharing splitters and L2 chargers in the program to further improve grid impacts and customer installation costs as EV adoption continues to increase.

Allowing a rebate of up to \$500 for the inclusion of home power-sharing technology incentivizes residential customers who are adding a 2nd or 3rd EV to stay within residential distribution design standards. Thus, this program strategy improves reliability for all by spreading the load over longer off-peak timeframes and reducing load ramps (e.g. two EVs charging at 9.6 kW spread over 4-6 hours on a single home circuit, instead of 19.2 kW spread over 2-3 hours). The undesirable alternative is that some customers would add a second EV charging circuit in their garage (which would not receive a rebate) not realizing the grid impact that this could have.



A power sharing splitter allows two L2 to safely utilize a single NEMA 14-50 outlet



A home charging setup for two EVs from a single NEMA 14-50 outlet offers power sharing for optimal load management as more homes adopt a second and third EV

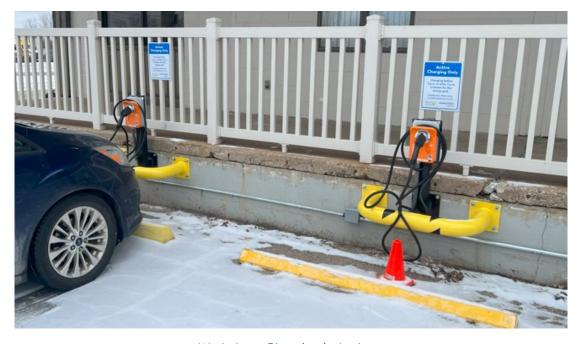
PowerMIDrive Multifamily & Public Level 2

The program team has shifted emphasis to L2 host sites with off-peak use cases. In alignment with the Company TEP goals, this is intended to increase the proportion of off-peak charging that occurs at rebated locations, improve equity via access to charging (i.e. multifamily, community charging, workplace charging), prepare for potential active managed charging in the future via telematics, and help supplement the still limited DCFC infrastructure supporting long distance travel to destinations.

Since the launch of PowerMIDrive in 2019, a total of 415 L2 rebates have been paid to site host locations across the state of Michigan. Figure 2 below outlines the breakdown of public Level 2 site accessibility for paid rebates as of March 31, 2025.

Public Level 2 Site Host Type	Rebates Paid	% of Program Rebates (415 Total)
Multifamily	48	12%
Community Charging	76	18%
Destination	117	28%
Workplace	174	42%

Figure 2: Level 2 Site Host Category Participation (Pilot + Permanent Program)



Workplace Charging in Jackson

Based on the rebate verification documentation received for completed public Level 2 sites as of March 31, 2025, a breakdown of project costs is outlined in Figure 3 below.

Per Dual Cord L2	Median Cost	Average Cost
Total Project Cost (Installation, Network & Maintenance Plan Fees, + Charging Station Equipment)	\$9,423	\$12,264

Figure 3: Public L2 Site Project Costs Per Dual-Cord L2

Installation and electrical upgrades at each site continue to be the greatest variable in total project costs. Sites requiring longer extensions of electrical service or underground wiring had higher project costs. Sites that installed pedestal mounted chargers had higher equipment costs than sites that opted for wall mounted chargers, and networked chargers are more expensive than unnetworked L2.

In some circumstances, sites completed installation of chargers and experienced challenges with maintaining a WIFI signal, resulting in the need for technical troubleshooting or additional equipment to extend or strengthen network range. In addition to the networking costs, these reliability challenges are why more sites are interested in un-networked L2s, utilizing a permit fee, or offering L2 charging at no additional cost as an amenity to attract customers.



Community Charging in Rockford



Fleet charging setup at a rental car agency

Figure 4 below identifies locations of sites which have completed installation and received Level 2 charging station rebates as of March 31, 2025.

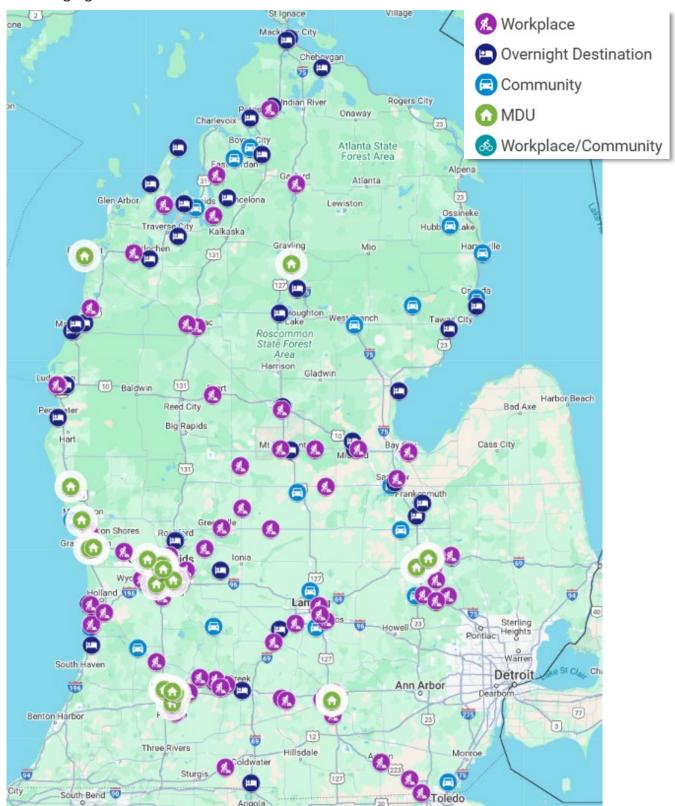


Figure 4: Public Level 2 Sites by Location & Type

DCFC Pilot

As of March 31, 2025, the continued implementation of the PowerMIDrive fast charging pilot had awarded a total of 88 of the 137 committed DCFC rebates for operational sites across the Company's service territory. The 49 DCFC projects still underway include 24 sites selected by MDOT to receive NEVI funding.

As part of our partnership with MDOT on DCFC sites awarded NEVI funding, we have begun make ready upgrade evaluations including a project scope and cost estimate for each site. This information will be included in each contractual agreement between NEVI site hosts and MDOT. The team is fully prepared with make ready plans and equipment to complete these projects once contracting is complete.

Because NEVI sites require four 150kW charge ports to qualify for federal funding, Consumers Energy is designing each NEVI site with a 750KVA transformer to ensure the infrastructure is adequate for the higher load of the chargers. Non-NEVI sites are more likely to utilize a transformer between 300 kVA and 500 kVA. In general, all these transformers are in short supply and can have lead times of 18-24 months, which is why the PowerMIDrive team is so focused on preparations for installation.

The PowerMIDrive team works in close collaboration with our Distribution Planning and Supply Chain partners to ensure we are forecasting new demand accurately and placing long lead time orders for higher power transformers, which have been challenged by supply chain limitations in the last several years. We encourage customers considering DCFC and large fleet projects to reach to us so that timelines can be optimized, and are actively working with EPRI and the EVs2Scale program to proactively forecast infrastructure needs to ensure timely installations in support of electrification.

Based on rebate verification documentation received for completed DCFC customer projects, a breakdown of project costs, excluding make ready upgrades, is outlined in Figure 5. Projects to date have primarily ranged between 125 kW and 200 kW.

	Median Cost	Average Cost	Standard Deviation
Total Project Cost Scope includes installation, Network & Maintenance Plan Fees, and Charging Station Equipment	\$163,690	\$192,163	\$63,844
Project Cost in \$/kW	\$972	\$1,010	\$355

Figure 5: DCFC Site Project Costs

Figure 6 below outlines the breakdown of make-ready expenses for the 88 completed DCFC rebates in PowerMIDrive through March 31, 2025.

	Median Cost	Average Cost	Standard Deviation
DCFC Make Ready Scope includes 300-750 kVA transformer and service meter, underground or overhead multiphase extension, boring costs, and local system upgrades	\$31,612	\$40,014	\$19,544
Make Ready Cost in \$/kW	\$189	\$253	\$128

Figure 6: DCFC Site Make Ready Costs



A DCFC in Wellston helps power travel between Manistee and Cadillac along the M-55 Corridor



A DCFC in Big Rapids aids EV travel along US-131

Figure 7 shows the geographic distribution of the 88 operational PowerMIDrive DCFC Rebate Sites and the 49 remaining fast charging rebates committed to projects in progress at customer locations. Consumers Energy does not own or operate any of these sites. All rebates are awarded to customers. Work remains to be done to support travel in much of our rural territory and tourist destinations.

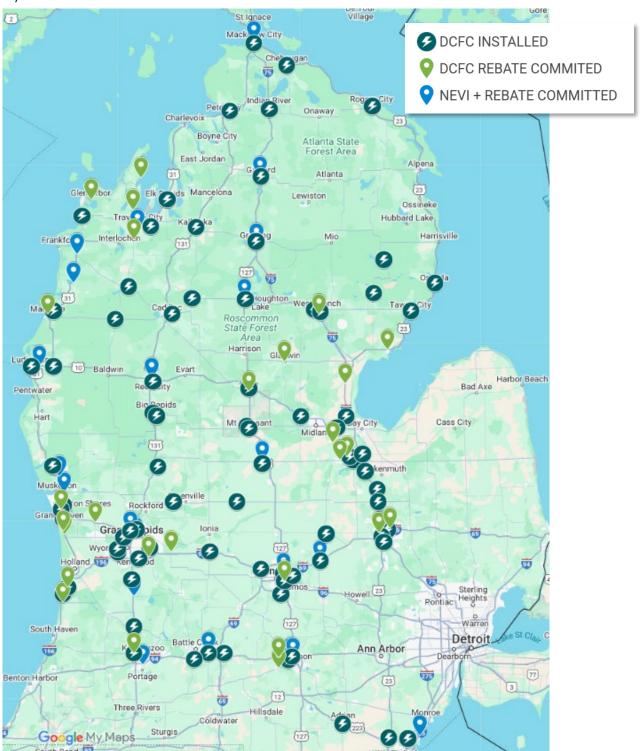


Figure 7: Fast Charging Locations

PowerMIFleet

As of March 31, 2025, a total of 61 customer fleet electrification assessments have been completed (most during the pilot phase), with four additional assessments still in progress. The strongest interest in assessment participation has been in the education and municipal sectors in aid of grant applications and funding requests, followed by small- to medium-sized retail businesses and transportation. This is why the permanent program chose to focus on these sectors, as they need the most assistance to transition to electric. As an additional benefit, fleet assessments within these sectors also benefit a large number and wide variety of Michiganders given their service territories. Figure 8 illustrates the breakdown of assessment participation for all 65 fleet assessments by customer sector.

PowerMIFleet Electrification Assessements by Customer Sector

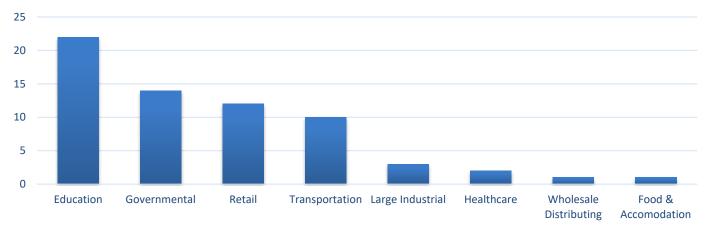


Figure 8: PowerMIFleet Assessments by Customer Sector

For the 61 completed customer fleet assessments to date, a total of 8,398 total vehicles were evaluated, with 2,987 of those vehicles, or 35%, recommended for electrification. In other words, more than 1 out of 3 vehicles are projected to save these agencies money compared to their ICE equivalent.

The PowerMIFleet team has established a quarterly follow-up cadence with assessment participants to provide technical support and guidance as organizational decisions are made to electrify fleet vehicles. In several cases, we have proactively provided workplace charging rebates to customers who wish to establish a network of chargers for employee use in preparation for future fleet EV deployment.

Furthermore, fleet charging rebates have also been provided to customers who did not require a fleet assessment prior to deploying fleet EVs. Going forward, fleet assessments will be reserved for novel fleet use cases where new learnings are available, or where a customer

fleet demonstrates that this service will bring their organization value, supporting an imminent fleet deployment.

As of March 31, 2025, a total of 137 L2 charger rebates and 11 DC charger rebates have been paid to PowerMIFleet program participants. An additional 79 L2 charger rebates and 88 DC long duration charger rebates are committed to customers with in-progress projects. Note that the majority of school districts awarded Michigan and/or EPA Clean School Bus funding make up nearly 100% of the long-duration DC charger rebates committed to in-progress projects at this time.

To date, PowerMIFleet rebates have supported a total of 240 vehicle deployments, with an additional 323 deployments anticipated in the next year. Figure 9 illustrates the breakdown of PowerMIFleet program participants' fleet electrification status by vehicle type to date, with more EVs yet to come given purchasing schedules, and state or federal funding award timelines.

Some vehicles on order, or projects anticipated this year may ultimately become delayed or canceled due to the revocation of previously announced and/or awarded federal funding or contracts (e.g., Oshkosh mail delivery trucks, EPA Clean School Bus Grants).

However, until we have received confirmation of a project's cancelation, the totals will be included in "vehicles on order" category of Figure 9 below, and we will continue to partner with



A school district installs 30kW Long-Duration DC chargers to power new electric school buses

these customers to ensure their projects are successful if able to progress to deployment.

PowerMIFleet Electrification Status By Vehicle Type

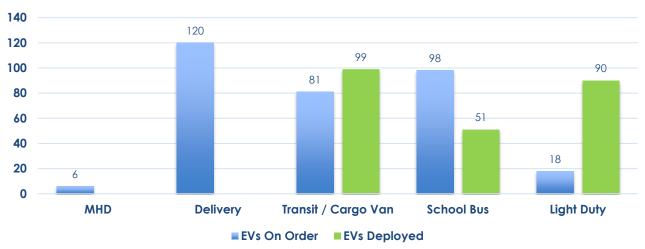


Figure 9: PowerMIFleet Customer Electrification Status by Vehicle Type



Fleet EVs can be operated and charged while loading indoors because there are no emissions, thereby creating new opportunities for building redevelopment





Consumers Energy helped the DNR electrify portions of their fleet and supported park visitors via L2s in State Parks for the Lake Michigan Circuit at Ludington and Pentwater

Finally, Figure 10 shows the geographic distribution of PowerMIFleet customer electrification projects as of March 31, 2025. The program team has intentionally sought projects from across our entire service territory to ensure fleet electrification benefits a wide variety of customers and use cases.

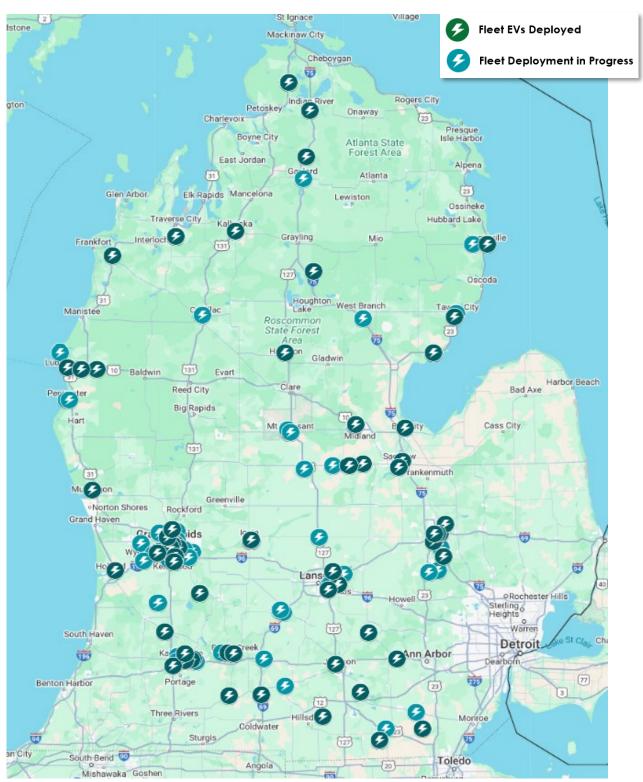


Figure 10 PowerMIFleet Customer Electrification Locations

Customer Education & Outreach

Through education and outreach efforts, the PowerMIDrive team was able to reach over 10,100 people. This includes 570 customers participating in our ride and drives, allowing them to experience driving electric and engage in program conversations regarding off-peak charging and TOU rates. Notably, 80% of the drivers experienced driving electric for the first time at our event.



PowerMIDrive team at 28th St. Metro Cruise

Between 2020 and 2024, the number of EVs in the Company's electric territory has grown dramatically, from approximately 8,800 EVs to nearly 40,000, which is a factor of 4.5 times. Given the rapidly growing state of EV market adoption, it is extremely important to identify segments of customers who are likely to already own an EV or purchase an EV as their next vehicle, and to get in front of the even larger number of customers intending to drive an EV in the future.

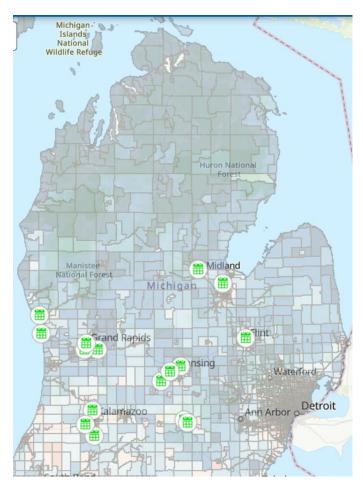


Figure 9: In-Person Customer Education & Outreach Locations Overlaid on MIEJ Screen Map

The number of direct customer contacts via phone calls and email communications has been high. A significant level of effort can be needed to assist customers with understanding their charging options, rate options, vehicle charging questions, and concerns about successful business models for public charging. This is why we have worked to continually enhance our website and outreach materials. In the last year, the program team made over 33,000 direct communications with EV customer contacts. This averages about 127 customer contacts per working day!

The level of specialized customer support has demonstrated that permanent staffing for EV customer specialists is a clear requirement for continued success. Our customer interactions also provide the team with direct insight into the challenges EV customers face regarding charging infrastructure, both at home and in public.

There is no substitute for getting in front of an engaged and interested audience, and Consumers Energy has actively sought such opportunities to educate customers about the benefits of pairing EVs with TOU rates, the expansion of public charging infrastructure, and EV charging etiquette. Over the last year,

The PowerMIDrive team hosted or attended 67 EV engagement events as presenter, panelist, or exhibitor, which is more than one per week. These events reached close to 4,000 participants, including many potential future EV drivers. Of these events, 8 were conducted within MIEJ (70+) and 3 in Justice 40 areas.



PowerMIDrive sponsored Clean Fuels Michigan's Disrupt event supporting EV charging start-ups

As shown in Figure 15, the program team organized and executed public L2 and DCFC charging station ribbon cutting ceremonies, car shows and ride and drives (e.g., Drive Electric Earth Day and National Drive Electric Week), EV101 presentations to both online and in-person, and EV driver social events.



The PowerMIDrive team at the Jackson Ride and Drive

We have found in-person events to be quite valuable in creating word of mouth campaigns for the program, earned media that helps reiterate program messaging, getting PowerMIDrive information into the hands of EV drivers and the EV curious, and often leading to additional speaking engagements for educational opportunities.



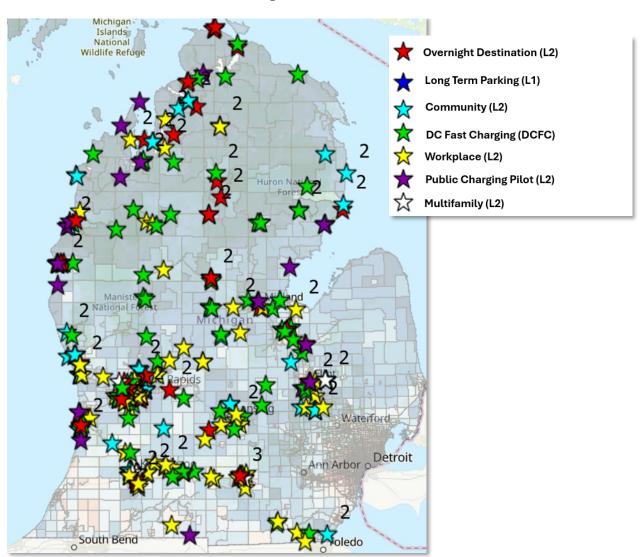
Customers get an overview of EVs before their ride and drive in Flint

Charging Up Underserved Communities

The PowerMIDrive and PowerMIFleet teams have also started tracking charging infrastructure rebates awarded within Justice 40 and MIEJ Screen areas of 70 and greater. The table and map below illustrate the results to date. We continue to actively engage with potential site hosts in these areas for rebate applications.

Site Host Category	Rebates in EJ40	Rebates in MIEJ 70+
Multifamily	12	24
Community Charging	11	13
Destination	10	11
Workplace	15	41
Public DCFC	4	6

Figure 12: EJ Rebates



TEP MANAGED CHARGING RESULTS

Charging Time Summary

A key strategy of our TEP customer programs is to maximize off-peak charging (residential and commercial) to benefit all customers via downward rate pressure and improved reliability. Optimized EV charging also directly supports our one-million EV by 2030 readiness in collaboration with Michigan's two million EV goal.

When the customer EV load management pilots initially began, it was projected that approximately 80% of charging would occur at home and 20% via public charging. The very first pilot also aimed to steer EV load to at least 70% off-peak charging. Initial pilot data tracked toward the 80/20 residential vs commercial projection but is now nearing 55/45 given the dramatic growth in demand for public charging. Furthermore, the TEP pilots not only achieved over 80% off-peak charging, but continued to optimize such that the total portfolio is now 89.6% off-peak!

Per Figure 13, Consumers Energy is pleased to report that off-peak charging has continued despite the dramatic 42.8% year over year (YOY) load growth across all categories and is still achieving world-class results with 95.9% off-peak charging across all the permanent customer programs! However, the EV charging market continues to evolve and significant growth in commercial charging is occurring. YOY load growth in community, multifamily, destination, workplace and DCFC indicate that these remain important areas for the TEP going forward. The continued changes in the market are reflective of both increased miles driven by EV, and PowerMIFleet data which shows that many light duty EVs provide cost savings for fleets.

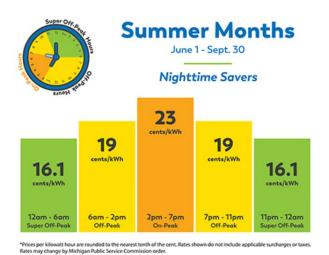
EV Customer Program Category	On-Peak 2PM-7PM	Off-Peak 7AM-2PM 7PM-11PM	Super Off-Peak 11PM-7AM & Weekends	Total Off-Peak by Category	Total kWh by Category	YOY Load Growth
Residential Single Family	2.1%	6.6%	91.3%	97.9%	53.8%	8.7%
Community Charging	21.6%	33.8%	44.6%	78.4%	1.3%	26258.6%
Multifamily	18.3%	35.2%	46.5%	81.7%	0.3%	162.9%
Total Residential	2.6%	7.4%	90.0%	97.4%	55.3%	11.6%
Destination L2+L1	20.6%	36.3%	43.1%	79.4%	1.4%	69.8%
Fleet & Workplace	8.9%	40.8%	50.3%	91.1%	12.1%	64.5%
DCFC Pilot	24.5%	35.2%	40.3%	75.5%	31.1%	154.7%
Total Commercial	20.1%	36.8%	43.1%	79.9%	44.7%	118.7%
TEP Programs	4.1%	13.9%	82.0%	95.9%	68.9%	19.1%
TEP Programs & DCFC Pilot	10.4%	20.5%	69.0%	89.6%	100.0%	42.8%

Figure 10: EV Charging per Category & Time Block April 2024 to March 2025

Figure 13 above shows the percentage of charging that happens in different on-peak and off-peak time blocks, in addition to the percentage of charging per category. In the residential sector, single family charging continues to lead all categories, with 97.9% off-peak charging and 53.8% of the measurable EV load. Community charging, which launched in 2023 and remains a very small 1.3% of the total kWh, is growing more rapidly than any other category (26,258.6%!) indicating high demand for equitable charging access. Multifamily properties are also still a small percentage of the total at 0.3%, but experiencing strong YOY load growth of 162.9%. The program team is leaning in with continued outreach efforts for multifamily and community charging.



A multifamily charging installation with off-peak signage



Example of TOU rate informational materials

In the commercial space, the fleet

and workplace programs are also performing well, with 91.1% off-peak charging, 12.1% of the total kWh, and 64.5% YOY load growth due to rapidly increasing EV adoption and the need for equitable charging access that workplaces can provide. Public L2 destination charging is still a small component of the total kWh at 1.4%, but growth of 69.8% YOY is indicating strong demand for this off-peak charging opportunity as more overnight and weekend EV travel locations are being enabled. Moreover, destination L2 infrastructure helps infill the still

emerging but fast growing DCFC infrastructure to aid long distance travel and replicates the residential overnight charging experience that many customers are used to.

Our position remains that DCFC infrastructure is highly unlikely to benefit from managed charging other than through technological means (e.g., pairing with battery storage for energy arbitrage in the future as battery prices continue to fall and where make ready costs are higher than average) that do not impact the customer experience.

Customers needing to charge immediately to get to their location are unlikely to accept active charge management that increases their charging duration or be deterred by marginally higher costs when charging is a necessity to reach their destination.

However, fast charging is a key enabler of EV adoption in areas lacking infrastructure and offpeak utilization is still a respectable 75.5% given weekend travel to the many tourist destinations in Consumers Energy's electric territory. Given these factors, and the strong utilization illustrated by 154.7% YOY load growth at host sites that have installed DCFCs, we believe it is prudent to incentivize one more round of fast charging rebates for communities lacking in infrastructure, which at this point are largely more rural areas with seasonal traffic. These communities will also benefit from attracting EV travelers coming from longer distances, such as Detroit, Toledo, and Chicago to Michigan's great destinations.



Fast charging sites in larger urban areas like Grand Rapids are likely to have a multitude of chargers

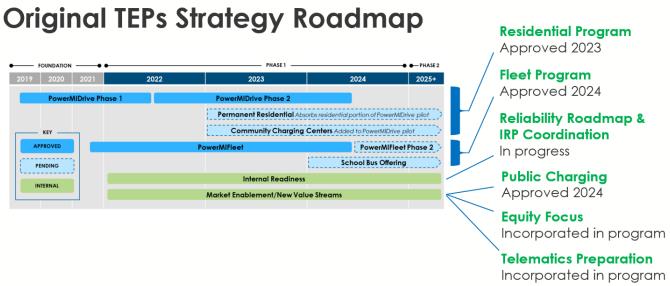
Fast charging sites up north and in more rural areas are more likely to only have two plugs, thereby challenging seasonal traffic and economic benefits to the community



TEP LOOKING FORWARD & STAKEHOLDER FEEDBACK

As an annual update, no changes to the Company TEP strategies are proposed in this report. With the goals from the first phase of the original TEP filing⁵ complete, the Company continues to implement the present TEP to ensure:

- 1. Load growth at the right time to benefit reliability and cost for all customers.
- 2. Encourage EV adoption and prepare for the millions of EVs that will be on the road.
- 3. Utilize margin from EV load growth to pay for EV load management programs while also creating downward rate pressure for all customers.



The currently planned phases of the Company TEP logically expand upon existing programs and tactics. In early 2026 the Company will again engage stakeholders regarding potential changes to future phases of our TEP and file an updated TEP by July 2026.

Future TEP Roadmap



⁵ See page 19 of Exhibit A-152 (JAM) in Case No. U-21224, which is page 2937 of 2942 in the PDF: <u>0688y000002IGMIAAM</u> (<u>site.com</u>)



A fast-charging site in Saginaw supported by PowerMIDrive offers excellent lighting and a canopy



Explore our TEP programs at: ConsumersEnergy.com/EV







STATE OF MICHIGAN

BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION

In the matter, on the Commission's own motion to open a docket for certain regulated electric utilities to file transportation electrification plan and for other related matters.)
PROOF O	F SERVICE
STATE OF MICHIGAN)) SS	
COUNTY OF JACKSON)	
Legal Department of Consumers Energy Coelectronic copy of Consumers Energy Co	orn, deposes and says that she is employed in the impany; that on June 27, 2025, she served an mpany's Transportation Electrification Plan sons listed in Attachment 1 hereto, at the e-mail
C	rystal L. Chacon
	ystal L. Chacon
Subscribed and sworn to before me this	27 th day of June 2025.

Melissa K. Harris, Notary Public State of Michigan, County of Jackson My Commission Expires: 06/11/2027 Acting in the County of Hillsdale

melisia Harris

ATTACHMENT 1 TO CASE NO. U-21538

Party	Mailing Address	Email Address
Administrative Law Judge		
Hon. Sally L. Wallace	7109 W. Saginaw Hwy., 3 rd Floor	wallaces2@michigan.gov
	Lansing, MI 48917	
Consumers Energy Company		
Gary A. Gensch, Jr., Esq.	One Energy Plaza	gary.genschjr@cmsenergy.com
Bret A. Totoraitis, Esq.	Jackson, MI 49201	bret.totoraitis@cmsenergy.com
Anne M. Uitvlugt, Esq.		anne.uitvlugt@cmsenergy.com
Spencer A. Sattler, Esq.		spencer.sattler@cmsenergy.com
Evan B. Keimach, Esq.		evan.keimach@cmsenergy.com
		mpsc.filings@cmsenergy.com
Michigan Public Service Com	mission Staff	
Nicholas Q. Taylor, Esq.	Assistant Attorneys General	taylorn10@michigan.gov
Anna B. Stirling, Esq.	Public Service Division	stirlinga1@michigan.gov
Alena Clark, Esq.	7109 W. Saginaw Hwy., 3 rd Floor	clarkA55@michigan.gov
Daniel Sonneveldt, Esq.	Lansing, MI 48917	sonneveldtd@michigan.gov
Lori Mayabb	_	mayabbl@michigan.gov
Attorney General Dana Nesse	<u> </u>	
Celeste R. Gill, Esq.	ENRA Division	gillc1@michigan.gov
Amanda Churchill	525 West Ottawa Street	AG-ENRA-Spec-Lit@michigan.gov
	6th Floor Williams Building	
	Post Office Box 30755	
	Lansing, MI 48909	
Michigan Cable Telecommun	ications Association ("MCTA")	
Sean P. Gallagher, Esq.	Fraser Trebilcock Davis &	sgallagher@fraserlawfirm.com
	Dunlap, P.C.	
	124 West Allegan Street	
	Suite 1000	
	Lansing, MI 48933	
Michigan Environmental Cou	ıncil, Natural Resources Defense C	ouncil, Citizens Utility Board of
Michigan, and Sierra Club		
Holly L. Hillyer, Esq.	Troposphere Legal	holly@tropospherelegal.com
Christopher M. Bzdok, Esq.	420 East Front Street	chris@tropospherelegal.com
Tracy Jane Andrews, Esq.	Traverse City, MI 49686	tjandrews@tropospherelegal.com
Natasha Fowles		natasha@tropospherelegal.com
The Kroger Co.		
Kurt J. Boehm, Esq.	Boehm, Kurtz & Lowry	kboehm@bkllawfirm.com
Jody Kyler Cohn, Esq.	36 East Seventh Street, Ste. 1510	jkylercohn@bkllawfirm.com
Michael L. Kurtz, Esq.	Cincinnati, OH 45202	mkurtz@bkllawfirm.com
Michigan Municipal Associat	ion for Utility Issues	
Valerie J.M. Brader, Esq.	Rivenoak Law Group, P.C.	valerie@rivenoaklaw.com
_	3331 W. Big Beaver Rd, Ste. 109	ecf@rivenoaklaw.com
	Troy, MI 48084	
Rick Bunch	Executive Director and Chairman	rick@mi-maui.org
	Michigan Municipal Association	
	for Utility Businesses	
	4989 Earhart Road	
	Ann Arbor, MI 48105	
Ford Motor Company		·
Valerie J.M. Brader, Esq.	Rivenoak Law Group, P.C.	valerie@rivenoaklaw.com
, 1	3331 W. Big Beaver Rd, Ste. 109	ecf@rivenoaklaw.com
	Troy, MI 48084	

^{*} Receives Confidential Materials

ATTACHMENT 1 TO CASE NO. U-21538

Energy Michigan Foundry	Association of Michigan, Michigan E	noray Innovation Rusiness
	Association of Michigan, Michigan F Innovation, Advanced Energy Unit	
and The Foundry Association	,	cu, Energy Wiemgan, me.,
Timothy J. Lundgren, Esq.	Varnum LLP	tjlundgren@varnumlaw.com
Laura A. Chappelle, Esq.	PO Box 352	lachappelle@varnumlaw.com
Justin K. Ooms, Esq.	Grand Rapids, MI 49501	jkooms@varnumlaw.com
	Business Council and Advanced Er	•
Dr. Laura S. Sherman	Michigan EIBC	laura@mieibc.org
	115 W. Allegan, Ste. 710	
	Lansing, MI 48933	
The Ecology Center, The En	vironmental Law & Policy Center, U	Union of Concerned Scientists, and
Vote Solar	,	,
Nicholas Wallace, Esq.	Environmental Law &	nwallace@elpc.org
Daniel Abrams, Esq.	Policy Center	dabrams@elpc.org
Alondra Estrada	35 East Wacker Drive, Suite 1600	aestrada@elpc.org
Carolyn Boyce	Chicago, IL 60601	cboyce@elpc.org
		mpscdockets@elpc.org
Michigan Electric Transmiss	ion Company, LLC	· · · · · · · · · · · · · · · · · · ·
Richard J. Aaron, Esq.	Dykema Gossett PLLC	raaron@dykema.com
Olivia R.C.A. Flower, Esq.	201 Townsend Street, Suite 900	oflower@dykema.com
Hannah Buzolits, Esq.	Lansing, MI 48933	HBuzolits@dykema.com
Courtney F. Kissel, Esq.		ckissel@dykema.com
, ,		mpscfilings@dykema.com
Urban Core Collective		
Amanda Urban, Esq.	Univ of Chicago Law School –	t-9aurba@lawclinic.uchicago.edu
Mark Templeton, Esq.	Abrams Env Law Clinic	templeton@uchicago.edu
Jacob R. Schuhardt, Esq.	6020 South University Avenue	jschuhardt@uchicago.edu
Sam Heppell, Esq.	Chicago, IL 60637	heppell@uchicago.edu
Madison Wilson		madisonswilson@uchicago.edu
		aelc mpsc@lawclinic.uchicago.edu
Association of Businesses Ad	vocating Tariff Equity	
Stephen A. Campbell, Esq.	Clark Hill PLC	scampbell@clarkhill.com
Michael J. Pattwell, Esq.	500 Woodward Avenue,	mpattwell@clarkhill.com
	Suite 3500	
	Detroit, MI 48226	
Hemlock Semiconductor Ope		
Jennifer Utter Heston, Esq.	Fraser Trebilcock Davis &	jheston@fraserlawfirm.com
, 1	Dunlap, P.C.	
	124 West Allegan Street	
	Suite 1000	
	Lansing, MI 48933	
Great Lakes Renewable Ener		
Don L. Keskey, Esq.	University Office Place	donkeskey@publiclawresourcecenter.com
Brian W. Coyer, Esq.	333 Albert Avenue, Suite 425	bwcoyer@publiclawresourcecenter.com
) -) 1·	East Lansing, MI 48823	
Walmart, Inc.		1
Melissa M. Horne, Esq.	Higgins, Cavanagh & Cooney, LLP	mhorne@hcc-law.com
, 1	10 Dorrance Street, Suite 400	
	Providence, RI 02903	

ATTACHMENT 1 TO CASE NO. U-21538

American Federation of Labor and Congress of Industrial Organizations, Michigan State Utility Workers Council, Utility Workers Union of American, Local 223			
Benjamin L. King, Esq.	McKnight, Canzano, Smith,	bking@michworkerlaw.com	
	Radtke & Brault, P.C.		
	3950 W. 11 Mile Road		
	Berkley, MI 48072		
DTE Electric Company			
Jon P. Christinidis, Esq.	One Energy Plaza, 1635 WCB	jon.christinidis@dteenergy.com	
	Detroit, MI 48226		
Michigan Electric and Gas Association			
Daniel Dundas, Esq.	7201 W. Saginaw Hwy., Ste. 305	dan@megautilities.org	
_	Lansing, MI 48917		