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April 5, 2024

Mr. Cru Stubley
Secretary to the Commission
Public Service Commission of Wisconsin
4822 Madison Yards Way
Madison, WI 53705

Dear Mr. Stubley:

Application of Wisconsin Electric Gas Operations, doing business as We Energies, a Gas Public Utility, for Authority to Install Natural Gas Transmission Facilities in the towns of Brighton, Dover, and Norway and the villages of Rochester, Raymond and Caledonia, and the city of Oak Creek, in Kenosha, Racine, and Milwaukee Counties, Wisconsin – Docket 6630-CG-139

Pursuant to Wis. Stat. § 196.49 and Wis. Admin. Code, PSC 133.03(1)(a), Wisconsin Electric Gas Operations ("WE-GO" or "the Company") proposes to install approximately 33 miles of 24-inch and 30-inch steel 650 psig maximum allowable operating pressure transmission main in the towns of Brighton, Dover, and Norway and the villages of Rochester, Raymond and Caledonia, and the city of Oak Creek, in Kenosha, Racine, and Milwaukee Counties. This project will be called the "Rochester Lateral Project" or "RLP". The proposed project will be described as having two potential routes, "Route A" and "Route B".

The Rochester Lateral Project will provide additional firm deliverability of natural gas to southeastern Wisconsin which will, in part, provide additional required firm natural gas service to Wisconsin Electric's proposed Oak Creek Combustion Turbine generation facility ("OCCT"), the proposed Paris RICE generation facility, and subsequently to the Elm Road Generating Station ("ERGS") after enhancements are made that will allow ERGS to operate completely fueled by natural gas.

The Company is making this filing to demonstrate the necessary firm natural gas deliverability to OCCT and support Commission Staff's review of that proposed project, which is part of Wisconsin Electric's Generation Reshaping Plan ("GRP"). The additional generation that will be provided by the OCCT Project is needed to ensure reliability and resiliency in the face of evolving regional energy market resource adequacy rules established by the Mid Continent Independent System Operator ("MISO"), manage substantial load growth, and ensure compliance with proposed US Environmental Protection Agency ("USEPA") rules.

Following is the application for the project prepared in accordance with the Public Service Commission of Wisconsin's Application Filing Requirements for Natural Gas Pipeline Construction Projects, dated February 2024.

The Company will submit a supplemental filing in October 2024 to include engineering and environmental field survey data that is not currently available but the Company recognizes is necessary for Commission Staff's review of this application.

To support the planned start of construction of the Rochester Lateral Project in late 2026 and completion in 2027, the Company respectfully requests a Commission decision by October 2025. If you have any questions concerning this project, please contact me at (414) 221-3685 or richard.stasik@wecenergygroup.com.

Sincerely,

Richard F. Stasik
Director–State Regulatory Affairs

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1.0 Project Overview

1.1 **Provide a list of all cities, villages, and townships and their respective counties, that the proposed project, any associated facilities, and any potential construction activities would cross or potentially impact.**

Pursuant to § 196.49, Wis. Stat., and § PSC 133.03 (1) (a), Wis. Adm. Code, Wisconsin Electric Gas Operations, ("WE-GO"), d/b/a We Energies, ("the Company"), is requesting a Certificate of Authority to install transmission main in the towns of Brighton, Dover, and Norway and the villages of Rochester, Raymond, and Caledonia and the city of Oak Creek, in Kenosha, Racine, and Milwaukee Counties. This project has been designated as the "Rochester Lateral Project", "RLP", or "the Project". The proposed project will be described as having two potential routes, "Route A" and "Route B".

1.2 **Describe the proposed project including the length of the proposed pipeline route(s) and associated new equipment or apparatus, including size.**

The Company proposes to install approximately 33 miles of 24-inch and 30-inch steel 650 pounds per square inch gauge ("psig") maximum allowable operating pressure ("MAOP") transmission main. The project also includes installation of five valve assemblies, improvements to an existing gate station, a new district regulator station, and a small segment of existing 16-inch 300 psig main to be replaced with 20-inch main. A map showing the location of the proposed facilities is attached in **Appendix A Attachment 1**.

1.2.1 **Identify proposed and alternative routes by letter (e.g. Route A, Route B, etc.) and segments by name (e.g. 1, 2A, 2B, 3, 4A, 4B, etc.) as instructed in 1.10.**[6]

There are two proposed potential routes for the project, Route A and Route B. Each route is divided into a number of segments. "A" segments are segments specific to Route A. "B" segments are specific to Route B. AB segments are segments where only one feasible route was identified. C segments are segments that connect the Route A and Route B at various locations that would allow for combinations of Route A and Route B segments, if desired.

See **Appendix A Attachment 2** for a map of the route segments.

Table 1 below summarizes the route segments that comprise Route A.

Table 1- Route A Segments

Segment Name	Size	Length (miles)
AB1	30"	0.31
A1	30"	2.55
A2	30"	1.39
A3	30"	0.36
AB2	30"	0.18
A4	30"	18.12
A5	30"	1.74
AB3	30"	1.35
AB4	20"	0.24
A6	24"	6.23

Table 2 summarizes the route segments that comprise Route B:

Table 2 - Route B Segments

Segment Name	Size	Length (miles)
B1	30"	0.07
AB1	30"	0.31
B2	30"	1.98
B3	30"	1.40
AB2	30"	0.18
B4	30"	1.00
B5	30"	17.17
B6	30"	2.34
AB3	30"	1.35
AB4	20"	0.24
B7	24"	6.25
B8	24"	0.24

Table 3 summarizes the Route C segments that could be utilized for connecting Route A and Route B.

Table 3 - Route C Segments

Segment Name	Size	Length (miles)
C1	24/30"	0.63
C2	24/30"	0.99
C3	30"	0.55

1.2.2 State preference of route if applicable.

The routes are similar in length and cost. The Company does not have a preferred route at this time and may identify a preferred route when more information is available in the supplemental filing in October 2024.

1.3 Identify the connection point to the interstate pipeline system.

The proposed Project connects into the existing Rochester Gate that ties into the ANR pipeline located on State Highway 20 in the village of Rochester.

1.4 Identify if proposed project is new construction, replacing an existing facility, modifying an existing facility, or abandoning an existing facility.

The proposed Project includes new pipeline construction, including the installation of five new valve assemblies, modifying the existing Rochester Gate station, and replacing a small portion of main on the power plant property.

1.5 Construction Schedule and Sequence

1.5.1 Provide the anticipated general construction schedule, identifying any potential seasonal or regulatory construction constraints. Include a timeline showing construction activities from beginning of construction to in-service.

Construction is tentatively scheduled to begin at the end of 2026 with an estimated completion by the end of 2027. There have not been any seasonal or regulatory construction constraints identified at this time. The company respectfully requests a Certificate of Authority (CA) be issued by October 2025 to facilitate the order of long lead-time materials, easement acquisition, environmental considerations, and coordination with new load additions in the southern Wisconsin area.

1.5.2 **Indicate how many construction spreads/phases will likely be used during construction, and the approximate length of each construction spread in miles.**

Due to the length of the Project and the construction schedule as well as the number of municipalities and agencies involved, the Project will be broken into phases for permit acquisition and construction reporting purposes. The Company will acquire all permits associated with each individual phase prior to the start of construction of that specific phase. See the proposed project permit phases below:

Table 4 - Permit Phases

Permit Phase	Route Segment(s) or Valve Assemblies Included in Permit Phase	Permit Phase Description (IDs can be found in Appendix A Attachment 12)	Length (Miles)
Phase P1S	Staging Area 1	Staging Area 1 to be used	N/A
Phase P2S	Staging Area 2	Staging Area 2 to be used	N/A
Phase P3S	Staging Area 3	Staging Area 3 to be used	N/A
Phase P4S	Staging Area 4	Staging Area 4 to be used	N/A
Phase GS	Rochester Gate	ID 01	N/A
Phase P1A	A6	ID 61-82	6.23
Phase P2A	AB1, A1	ID 01-08	2.87
Phase P3A	A2, A3, AB2, A4	ID 09-25	6.21
Phase P4A	A4	ID 26-35	7.03
Phase P5A	A4	ID 36-39	3.77
Phase P6A	A4, A5	ID 40-52	4.78
Phase P7A	AB3	ID 53-57	1.35
Phase P8A	AB4	ID 58-60	0.24
Phase PV1A	V1A	ID 08	N/A
Phase PV2A	V2A	ID 25	N/A
Phase PV3A	V3A	ID 35	N/A
Phase PV4A	V4A	ID 39	N/A
Phase PV5A	V5A	ID 82	N/A
Phase P1B	B7, B8	ID 139-146	6.48
Phase P2B	B1, AB1, B2, B3, AB2, B4	ID 83-85, 01-04, 86-96, 16-18, 97-103	4.95

Permit Phase	Route Segment(s) or Valve Assemblies Included in Permit Phase	Permit Phase Description (IDs can be found in Appendix A Attachment 12)	
Phase P3B	B5	ID 104-112	4.96
Phase P4B	B5	ID 113-121	6.28
Phase P5B	B5, B6	ID 122-135	6.95
Phase P6B	B6	ID 136-137	1.32
Phase P7B	AB3	ID 53-57	1.35
Phase P8B	AB4	ID 58-60	0.24
Phase PV1B	V1B	ID 103	N/A
Phase PV2B	V2B	ID 112	N/A
Phase PV3B	V3B	ID 121	N/A
Phase PV4B	V4B	ID 135	N/A
Phase PV5B	V5B	ID 146	N/A
Phase PHPDR	High Pressure District Regulator Station	ID 56	N/A
Phase PSCCT	SCCT Meter Set	ID 55	N/A

1.5.3 **Describe the construction sequence for any given construction spread/phase from commencement of construction through completion of construction, and how those construction spreads relate to each other (i.e. built at same time, certain activities such as clearing conducted on different spreads at the same time).**

Each construction sequence will begin with work area preparation and installation of best management erosion control practices. Clearing, brush-removal and grading, including soil segregation will be performed to provide a level area to facilitate pipe-laying operations and transportation of construction equipment and personnel. Pipe sections will be delivered and positioned along the route and welded to form a continuous pipeline. All completed welds will then be visually and radiographically inspected; field-applied epoxy coatings will then be applied to all weld joints and fittings prior to backfill. Current drain tests will be conducted following all jack and bore and HDD installations. For trenching operations, the pipeline will be lowered in the trench and inspected. The trench will then be padded and backfilled. Road ROW and acquired easement will be restored to preconstruction conditions

including pavement restoration, surface grading, decompaction and re-vegetation.

Clearing activities may occur simultaneously with pipe installations on other spreads. Trenching and boring installations may take place simultaneously along the route. Additional information will be included in the supplemental filing.

1.5.4 **Describe to what extent final grade will affect predevelopment drainage patterns.**

The final grade of the street right-of-way and construction areas will match the preconstruction grading, and there will be no change to the existing drainage pattern.

1.6 **Provide the names and contact information for utility representatives available to answer technical questions concerning the proposed project, cost, rates, etc.**

If you have any questions concerning this Project, please contact Richard Stasik at (414) 221-3685 or richard.stasik@wecenergygroup.com.

1.7 **Identify individuals and mailing addresses for any person with transmission facilities as defined by Wis. Stat. § 182.0175(1)(c) affected by the project and the status of their notification.**

The Project will tie into the Company's existing Lakeshore Lateral transmission pipeline. It will also tie into the ANR Rochester Gate Station. The Company has been in discussions with ANR (W3925 PIPLINE LN EDEN WI, 53019) regarding the work required on their facilities to support this project.

1.8 **Other Agency Correspondence/Permits/Approvals**

1.8.1 **Provide copies of all official correspondence between the applicant and all state, federal, or local government entities as described in the Introduction page, ii-iii**

The Company has initiated discussions with the Wisconsin Department of Natural Resources (WDNR), the Wisconsin Department of Agriculture, Trade and Consumer Protection (DATCP) and the Wisconsin Department of Transportation (DOT). Discussions will continue throughout the project design. As part of the application process, a certified Endangered Resource Review (ER Log #TBD) for the project was submitted on March 14, 2024. The WDNR review is ongoing as of this submittal. Once received, the finalized ER Review will be provided. The map showing the

location of Natural Heritage Inventory (NHI) search area is included as **Appendix F Attachment 16**.

The Company has also contacted local municipalities and agencies regarding the Project and will continue communications throughout the project duration. Those contacts include:

- Towns of Brighton, Dover, and Norway
- Villages of Rochester, Raymond, and Caledonia
- City of Oak Creek
- Kenosha, Racine, and Milwaukee County

1.8.2 **Identify any issues or concerns raised by any state, federal, or local government and how those issues/concerns have been addressed in the application.**

To date, no issues have been identified. Any issues will be addressed through the longstanding permitting and review process.

1.8.3 **Provide a list of all federal, state, and local permits/approvals that would be required for this project and their status (Wis. Admin. Code § PSC 133.04 (10)).**

Permitting needs were researched and are summarized in **Appendix E Attachment 7**. The Company will continue to work with local units of government to identify any additional permits that may be required.

1.9 **Mailing Lists**

1.9.1 **Provide Microsoft Excel mailing lists in an acceptable format that is able to be cross-referenced to GIS parcel data as described in the Introduction, page iv-v.**

The mailing lists provided are in an identified preferred format. **Appendix B Attachment 1** includes property owners located up to 300 feet from the facilities that are part of this application.

1.9.2 **Provide the following mailing lists:**

The mailing lists are referenced below:

1.9.2.1 **Properties from which any easements would be required for construction or operation of the proposed project. Include the owners name, the address of the property, and the property**

owner's address if different from the property's address.

The mailing list for properties from which easements would be required for construction of the proposed Project is included in **Appendix B Attachment 2**.

1.9.2.2 Public properties, such as schools or other government-owned land upon which structures or pipelines would be construction through.

Public properties upon which the pipeline would be constructed through are included in **Appendix B Attachment 3**.

1.9.2.3 Chief executive officers of the cities, villages, townships, and counties potentially affected by the project.

The mailing list for chief executive officers of the cities, villages, townships, and counties potentially affected by the Project is included in **Appendix B Attachment 4**.

1.9.2.4 Regional Planning Commission with jurisdiction over the project area.

The mailing list for the Regional Planning Commission with jurisdiction over the Project area is included in **Appendix B Attachment 4**.

1.9.2.5 Applicable state and federal agencies.

The mailing list for applicable state and federal agencies is included in **Appendix B Attachment 4**.

1.9.2.6 Tribal government representatives for Native American Tribes that hold off reservation treaty rights in Ceded Territory. This only applies to projects within the following counties: Ashland, Barron, Bayfield, Burnett, Chippewa, Clark, Douglas, Dunn, Eau Claire, Florence, Forest, Iron, Langlade, Lincoln, Marathon, Marinette, Menominee, Oconto, Oneida, Polk, Portage, Price, Rusk, Sawyer, Shawano, St. Croix, Taylor, Vilas, Washburn, and Wood County.

Not applicable

1.10 **Project Maps**

- OVERVIEW MAP – An *Overview Map* is provided in **Appendix A Attachment 1**.
- SEGMENT MAP – A Segment Map is provided in **Appendix A Attachment 2.**
- SEWI SYSTEM MAP – A map displaying the SEWI gas system in relation to RLP is provided in **Appendix A Attachment 3**.
- LAND USE AND ZONING - *Zoning and Current Land Use Maps can* be found in **Appendix A Attachments 4 and 5**.
- POTENTIAL STAGING AREAS – A map displaying potential staging areas is provided in **Appendix A Attachment 11**.
- PLAN AND PROFILE MAP SET – Mapbooks showing the plan with profile views for Route A, B and C can be found in **Appendix A Attachments 13, 14 and 15** (each set is split into about 50 pages to accommodate the 20MB file size limits).
- PROPOSED PLAN SET – More zoomed out, 1-mile mapbooks showing the proposed route and easements for Route A, B and C can be found in **Appendix A Attachments 16, 17 and 18** (each set is split into about 10 pages to accommodate the 20MB file size limits).
- ENVIRONMENTAL DATA - Environmental maps and analyses can be found in **Appendix F**.
- UTILITY INFRASTRUCTURE DATA - Collection of existing utility information is ongoing and will be completed prior to our final construction design.

1.11 **GIS Data Files**

ESRI ArcGIS Data Files – Public / Redacted versions of ESRI ArcGIS data files are submitted via the Commission's ERF System. Confidential versions of the ESRI ArcGIS data files will be submitted to the Commission via a secured FTP site managed by Commission Staff.

A spreadsheet that lists each GIS file is included in **Appendix C Attachment 1**.

2.0 Routing and Siting Information

2.1 **Describe any major system level alternatives, such as connecting to a different interstate pipeline system and explain why these alternative where not selected.**

The RLP will provide additional firm natural gas deliverability to southeastern Wisconsin, which will in part, provided the required firm deliverability to serve Wisconsin Electric's proposed Oak Creek Combustion Turbine ("OCCT") project and subsequently, ERGS, after enhancements are made to allow ERGS to operate while fueled completely by natural gas. The Rochester Lateral is required regardless of supply source (ANR, Guardian, NNG) as there is not currently sufficient distribution

infrastructure to meet the incremental significant natural gas load.

2.2 **Provide information supporting the purpose and necessity of the project with supporting data.**

The Company continues to focus on meeting customer demand for natural gas service. Recently, demand for firm natural gas service has increased significantly in southeastern Wisconsin. The increased demand for firm natural gas service was analyzed and it was determined that an approach including an increase in capacity on the Company's local distribution network and local natural gas storage in the form of LNG provides the optimal solution in terms of economics and reliability. Within this application, the Company seeks approval to construct the Rochester Lateral Project ("RLP").

Purpose and Necessity

The Company has received a request from its customer, Wisconsin Electric Power Company ("Wisconsin Electric")[1] for firm natural gas service at existing and planned electric generation facilities in southeastern Wisconsin.

Incremental Natural Gas Demand

Customer requests for additional firm natural gas service are in the following locations.

Table 5 Requested Need for Incremental Capacity

[redacted]

The 2023-2024 WE-GO firm peak-day forecast is 783,985 dth/day. The requests shown above represent an increase in firm peak-day demand of 61%.

[1] For utility purposes, Wisconsin Electric Power Company - electric operations is treated separately from Wisconsin Electric Power Company – gas operations and Wisconsin Electric Power Company - electric operations is a full sales (non-transportation service) customer of Wisconsin Electric Power Company - gas operations.
[2] Oak Creek location includes ERGS and the proposed OCCT.

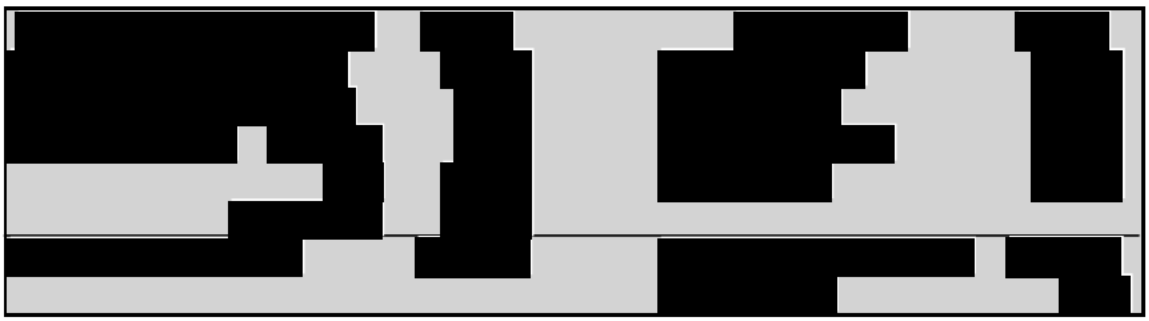
Interstate Pipelines and LNG Facilities Serving Southeast Wisconsin

ANR Pipeline Company ("ANR") and Guardian Pipeline LLC ("Guardian") currently provide about 75% of WE-GO's peak day deliverability in southeast Wisconsin (the "Lakeshore/Western Area"). Natural Gas Pipeline Company ("NGPL"), and Northern Natural Gas ("NNG") also serve the Lakeshore/Western area of WE-GO's service territory, along with the Bluff Creek LNG facility.

Capacity Need

WE-GO has received a request from its customer, Wisconsin Electric – electric operations for firm natural gas service at existing and planned electric generation facilities in southeastern Wisconsin. The requested firm service level, along with existing and planned peak day natural gas deliverability resources, is outlined in the following table.

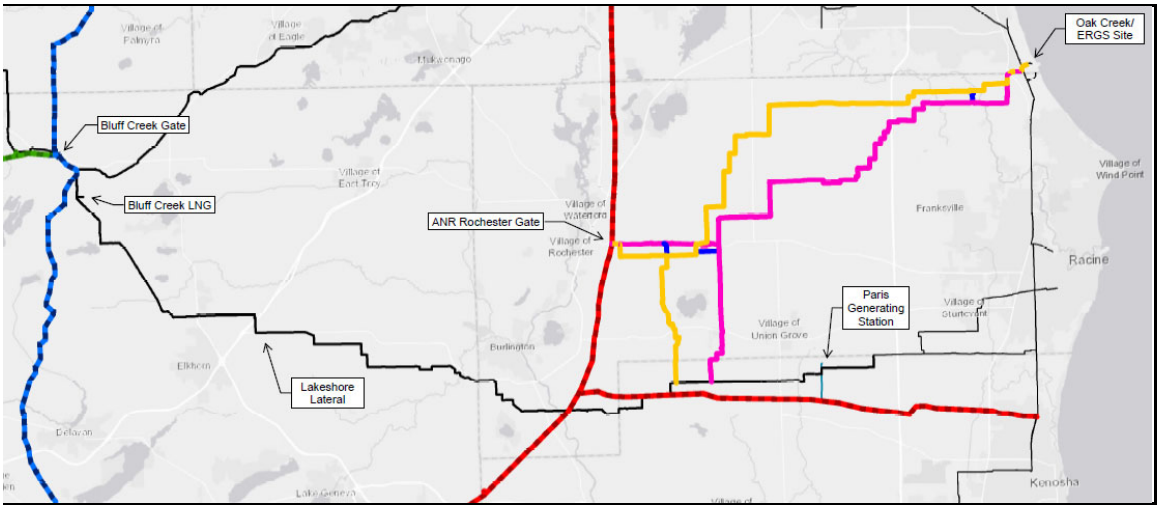
Table 6 - Forecasted Firm Requirement and Resources, WE-GO Lakeshore/Western[3]



The Lakeshore/Western area represents a majority of WE-GO's total load. As shown above, this area will be adequately supplied on a peak day with the proposed resource mix, including the Rochester Lateral Project. The resource mix for additional firm natural gas resources includes RLP, the [redacted] that was requested for acquisition in docket (6630-GP-2023), and the proposed Oak Creek LNG (OCLNG) facility, for which an application will be filed shortly after this application. In the aggregate, these three projects, when evaluated together, provide the most reliable and economic solution to meet customer load additions in the Lakeshore/Western area of WE-GO. The following map shows the geographic locations of the requested firm deliverability locations along with the required resource additions (and can also be found in **Appendix A Attachment 3**).

[3] ERGS: Elm Road Generating Station; RICE: Reciprocating Internal Combustion Engine

Figure 1 - WE-GO Southeast Wisconsin System Map



The RLP is a critical distribution system expansion that will tie supply and load together from Bluff Creek on the west to Oak Creek on the east. This 33-mile pipeline project, with proposed routes shown in pink and yellow in Figure 1 above will provide reliability benefits for new and existing load by connecting the Lakeshore Lateral Project (LLP) to the Rochester ANR Gate Station and the combined South Oak Creek and ERGS campus. The RLP is required to serve Wisconsin Electric's proposed OCCT project and ERGS after enhancements are made to allow ERGS to operate while fueled completely by natural gas. The RLP is required regardless of supply source (ANR, Guardian, NNG) as there is not currently sufficient distribution infrastructure to meet this significant natural gas load.

While the RLP, combined with the [redacted] will provide baseload firm deliverability for the majority of days each year, the OCLNG facility will provide needed peaking capacity to provide system reliability on the coldest winter and highest load days of the year.

Firm Capacity Need for Electric Generation

Charged with responsibility for the reliability of the electric power market, the Midcontinent Independent System Operator ("MISO") has implemented a seasonal capacity construct that makes firm fuel supply, especially in winter, a critical component of reliability and managing costs for customers. MISO is also proposing additional changes to the resource adequacy constructs that will rely on firm deliverability of natural gas to electric generation facilities. At the same time these resource adequacy changes are being developed and implemented, Wisconsin Electric is forecasting significant new electric load requirements in Southeastern

Wisconsin, particularly in the area referred to as the I-94 corridor between Milwaukee and the Illinois state line.

Furthermore, the USEPA has proposed rules under the Clean Air Act that will require electric generation facilities to comply with their standards of performance by January 1, 2030.

The electric generation fleet at Wisconsin Electric and across the U.S. is in the midst of a significant shift from fossil fuel to renewables. The significant retirement of dispatchable coal generation has resulted in changing market dynamics and put a spotlight on reliability. Upwards of 20,000 MW of coal fueled generation has retired with the MISO footprint since 2005, with more than an additional 30,000 MW expected to retire by 2042 on a system with a peak load of approximately 130,000 MW. To fill the gap, a significant amount of intermittent (non-dispatchable) renewable generation is being built. This transition impacts not only the Wisconsin Electric generation fleet, but the generation mix across the MISO footprint and a significant portion of the United States. This transition has placed significant responsibility for reliability on dispatchable, flexible natural gas fueled generation facilities.

The risk of not having electric energy available at all hours is a present risk that is recognized by the Regional Transmission Organization ("RTO"), North American Reliability Corporation ("NERC"), and Reliability Organizations such as the Midwest Reliability Organization ("MRO"). In their 2023 Long Term Risk Assessment, NERC lists MISO as "High Risk" regarding potential future electricity supply shortfalls under not only extreme but also normal conditions. MRO, for the first time in their history, identified an Extreme Risk for Energy Availability in their 2024 Regional Risk Assessment. While Wisconsin Electric is in the Reliability First reliability organization, the MRO is immediately to the west, which implies Wisconsin Electric cannot prudently rely on neighboring states or utilities to support energy needs.

Given these factors and the significant forecasted load additions, Wisconsin Electric must seek a combination of resources that can ensure the energy needs of all customers are met at all times. Only fully dispatchable gas plants can provide needed energy over days and even weeks when renewable energy generation resources are limited. Natural gas generation facilities are flexible resources that can help fill long-duration energy gaps.

Further, NERC's annual Winter Reliability Assessments have continued to highlight lack of fuel during extreme cold as a concern to maintaining a reliable power grid. MISO has also noted concerns regarding availability of gas resources in cold weather events. As the CEO of MISO, John Bear, noted in his updated letter to the EEI CEOs:

> *During Winter Storm Elliot, unplanned outages spiked significantly with nearly half of those reported to be due to fuel supply or transportation issues. A very similar scenario played out during Winter Storm Uri in 2021.*

To address these concerns, MISO has been moving rapidly to make changes to incentivize market participants to replace the retiring fully dispatchable plants with resources which have the needed characteristics to maintain grid reliability. This can be seen in changes in operations (new products), transmission planning through Long Range Transmission Planning ("LRTP") Tranche 1 and Tranche 2 ("LRTP1/2") and most notably in the resource adequacy changes. Specifically, MISO has moved to a seasonal construct as well as accrediting the capacity of generation resources based off of performance in critical hours, both which are designed to manage the growing reliability risk in non-summer months where intermittent and gas-fueled units face the greatest availability challenges. The industry's growing concern regarding energy surety in winter (Winter Storms URI and Elliot) resulted in MISO's most recent changes. In addition, the methodology used by MISO to accredit the capacity of generation facilitates was changed so that units not available during critical hours (no matter the cause) that facility's capacity that can be counted to meet the utility's obligations will be greatly reduced. These changes are intended to manage winter reliability risk that has recently manifested in various markets.

Given this real and critical risk and changes to the MISO Resource Adequacy construct, WE-GO customer, Wisconsin Electric, is working to improve reliability and ensure compliance with the changes as well as other regulatory updates, including the USEPA Clean Air Rules, during this transitional period by taking the following actions:

1. Securing firm gas supplies to operate generation facilities reliably within the MISO Seasonal Capacity Construct. The seasonal construct puts a focus on the reliability of natural gas power plants during the winter months and having firm natural gas availability, including that provided by pipeline capacity, is crucial to meeting this need.
2. Securing the benefits of local gas storage supply in the form of liquefied natural gas ("LNG") facilities to be constructed by WE-GO on Wisconsin Electric plant property to bolster reliability.
3. Take natural gas service as full sales natural gas utility (not Transportation) customers. This provides a benefit to all other gas customers by spreading fixed costs over additional sales and benefits electric reliability by allowing a greater utilization of WE-GO deliverability capacity and storage assets.

WE-GO must take prudent action to ensure the reliability of the energy delivery networks of Wisconsin to ensure its customers, including Wisconsin Electric –

electric operations, have the energy they need – whether to heat their homes during the coldest winter days or to fuel economic growth of the State of Wisconsin.

Strategic Fit

RLP is a critical piece of infrastructure that is part of a multi-pronged approach, along with firm interstate pipeline capacity ([redacted]) and the OCLNG facility. Without RLP, there is not enough capacity on the WE-GO distribution system to provide natural gas for the proposed OCCT or the future ERGS upgrade to provide the ability for ERGS to operate completely on natural gas. As discussed above, these facilities will be critical in supporting the transition of the electric system away from fossil fuels and toward greater percentages of renewable energy.

RLP and the [redacted] provide the needed baseload source of natural gas to serve incremental power generation demand for a majority of the year. WE-GO was able to reduce its demand for firm, pipeline transportation services, however, by utilizing the proposed OCLNG peaking facility to serve load on the coldest and highest demand days of the year.

A load duration chart shows loads ordered from largest to smallest, instead of in chronological order. This type of chart is useful for determining the resources that will be required over a winter period by highlighting the relatively low number of days that the highest loads will occur.

The following chart shows the load duration curves for the past five winters at WE-GO, along with the expected high-load future curve. Additional firm interstate pipeline capacity acquired through the [redacted], and delivered via RLP, is required for the load increase forecast for the generation resources of Wisconsin Electric, a firm sales customer of WE-GO.

Figure 2: WE-GO Firm Load Duration Curve: Dth/day

The three electric generation facilities are estimated to have the capacity factors shown in Table 7 below during the winter period. The capacity factors are consistent with the 2027-2028 load duration curve above. Table 7 also shows the estimated hours of dispatch for the three power plants on the 10 highest load days of the winter season.

Table 7 - Winter Capacity Factors and Cold Day Availability

The load duration curve shown in Figure 2 above demonstrates the need and criticality of additional interstate pipeline capacity and RLP as part of the resource mix. It is projected that loads on the WE-GO distribution system will exceed currently contracted supply sources for between 35-50 days each winter. This is not a need that can be filled solely with peaking or LNG supply, but can be solved with a combination of RLP, the project, and OCLNG.

Economic Solution for Customers

RLP and the [redacted], along with the OCLNG peaking facility, is the optimal solution for WE-GO customers. OCLNG will allow WE-GO to avoid costly, additional, pipeline expansions, while RLP will provide supply access to both interstate pipelines and LNG facilities across the wide area of southeast Wisconsin. This will enhance reliability and resiliency, while also meeting the needs of the electric power system that will be critical to the transition from fossil fuel to a more renewable baseload electric generation fleet.

2.3 **Describe how the proposed project relates to any future projects the applicant is considering in the area.**

As stated in 2.2, this project will provide firm deliverability of natural gas to the OCCT the application for which is being filed by Wisconsin Electric simultaneously with WE-GO filing this application. This project will also support the future enhancements to ERGS which will result in it being capable of operating completely on natural gas (and will be the subject of a separate application filed at a later date).

Lastly, the OCLNG facility, for which WE-GO will be filing an application in the near future, will also complement the RLP as a peaking resource that will provide needed firm natural gas deliverability to WE-GO customers on the coldest winter days, while the RLP will provide firm gas deliverability to WE-GO customers the remaining days of the year.

2.4 **Provide an explanation of how the project is consistent with future overall projects.**

The Project is part of WE-GO's overall strategy to increase reliability, enhance resiliency and meet increasing demand for peak day natural gas deliverability in Southeastern Wisconsin. Providing necessary firm service for electric generation facilities will enable the transition to renewable energy over the next several decades while providing the reliability required of the electric network and also adding further reliability for the natural gas delivery network in Southeastern Wisconsin.

2.5 **Provide an analysis of the ability of energy conservation and efficiency to reduce, alter, or eliminate the need for this project.**

This Project is an extension of natural gas pipeline to increase reliability, enhance resiliency and meet increasing demand for peak day natural gas deliverability in Wisconsin. Therefore, the Company does not foresee that energy conservation or efficiency will reduce, alter, or eliminate the need for this Project.

2.5.1 **A description of the existing services available to customers, including any demand response programs or voluntary energy efficiency programs operated by the utility.**

Not applicable

2.5.2 **An indication of the amount of additional energy efficiency and demand response, needed to reduce, alter, or eliminate the need for this project. Clearly identify and distinguish the amount of energy efficiency and demand response assumed to be achieved through Focus on Energy and utility programs from the additional energy efficiency and demand response needed to reduce, alter, or eliminate the need for this project.**

Not applicable

2.5.3 **A discussion of the feasibility of achieving the level of energy efficiency and demand response identified in Section 2.5.2. Feasibility analysis should take into account:**

- **A clear definition of the energy efficiency and demand response programming options considered by the utility, and the potential savings, defined as the reduction in energy and capacity associated with the programs, that are available through those options;**
- **The cost-effectiveness of available energy efficiency and demand response options, relative to the costs per unit of the proposed project;**
- **The total savings required to reduce, alter, or eliminate the need for the project, and the corresponding financial investment required to achieve those savings; and**
- **The utility's ability to implement new or expanded programs to achieve available savings.**

Please provide analysis to address multiple different scenarios that distinguish between options for reducing, altering, and eliminating the project need. Please provide modeling and/or spreadsheet analysis to fully assess the cost comparison between the proposed project and all alternative scenarios analyzed.

Not applicable

2.6 **Provide an analysis that examines the proposed project's cost-effectiveness, technical feasibility and environmental soundness in meeting the energy demand with respect to the following energy priorities (Wis. Stat. §§ 1.12(4) and 196.025(1)(ar)). The feasibility analysis language used above in section 2.5.3 should be adapted and applied to the following two resource types:**

Section 196.025(1), Wis. Stats., requires the Commission, to the extent cost-effective, technically feasible and environmentally sound, to implement the priorities under §1.12(4), Wis. Stats., in making all energy-related decisions and orders. Section 1.12(4), in turn, states that in meeting energy demands, the policy of the state is that, to the extent cost-effective and technically feasible, options be considered based on the following priorities, in the order listed:

(a) Energy conservation and efficiency.
(b) Noncombustible renewable energy resources.
(c) Combustible renewable energy resources.
(d) Nonrenewable combustible energy resources, in the order listed:
    1. Natural Gas.
    2. Oil or coal with a sulphur content of less than 1 percent.
    3. All other carbon-based fuels.

The energy-related decision presented to the Commission in this proceeding is whether it should authorize construction of the Project. The purpose of the Project is to deliver natural gas to ERGS and OCCT. A gas pipeline is the only feasible way to deliver natural gas. Additional conservation activities, renewable resources, or any other energy priorities listed in Wis. Stats. §1.12(4) cannot provide a means to provide additional pipeline capacity in the area. Therefore, the Project satisfies the requirements of the energy priorities law.

2.6.1 **Noncombustible renewable energy resources**

Not applicable.

2.6.2 **Combustible renewable energy resources**

Not applicable.

2.7 Routing and Siting Information

2.7.1 **Describe the factors considered and weighted criteria used in the applicant's evaluation of potential routes and locations for the natural gas pipeline/infrastructure and its associated facilities, including the use of weighted criteria used to evaluate potential routes.**

Each route segment was evaluated based on three primary factors for comparisons: location, cost and environmental impacts. Based on the evaluation, each segment was categorized and scored using a weighted number one through five, with five being more favorable. Details of the three criteria and weighting factors are included below.

The three factors were then summed for each route and sorted by the highest total score. A total of 48 different potential routes were created using a combination of the available route segments beginning at Rochester Gate, ending at Oak Creek, and also connecting to LLP. Segment B1 was omitted from the analysis as it had minimal impact and could easily be added to any of the proposed routes. The results of the route analysis can be found in **Appendix A Attachment 6**. Notably, Route A was the highest scoring route while Route B was the 17th highest scoring route. Detailed maps of the five highest scoring routes are provided in **Appendix A Attachment 10**.

Route Location

Various location types were assigned along the route and then averaged for an overall segment location score. The location types and the factors within each location type can be found in **Appendix A Attachment 7.**

Construction Costs

Cost estimates for the pipe construction were generated for every segment and assigned a weighted criteria. The cost estimate is calculated from a review of footage of the most likely construction method(s) used in the segment and the per foot cost of the respective method. Fixed adders were applied for each occurrence in a segment, such as horizontal directional drill (“HDD”) setup, as well as an overall adder to the route for contractor costs, like inspection services and staging areas. The pipe construction cost estimate for each segment can be found in **Appendix A Attachment 9.**

Environmental Impacts

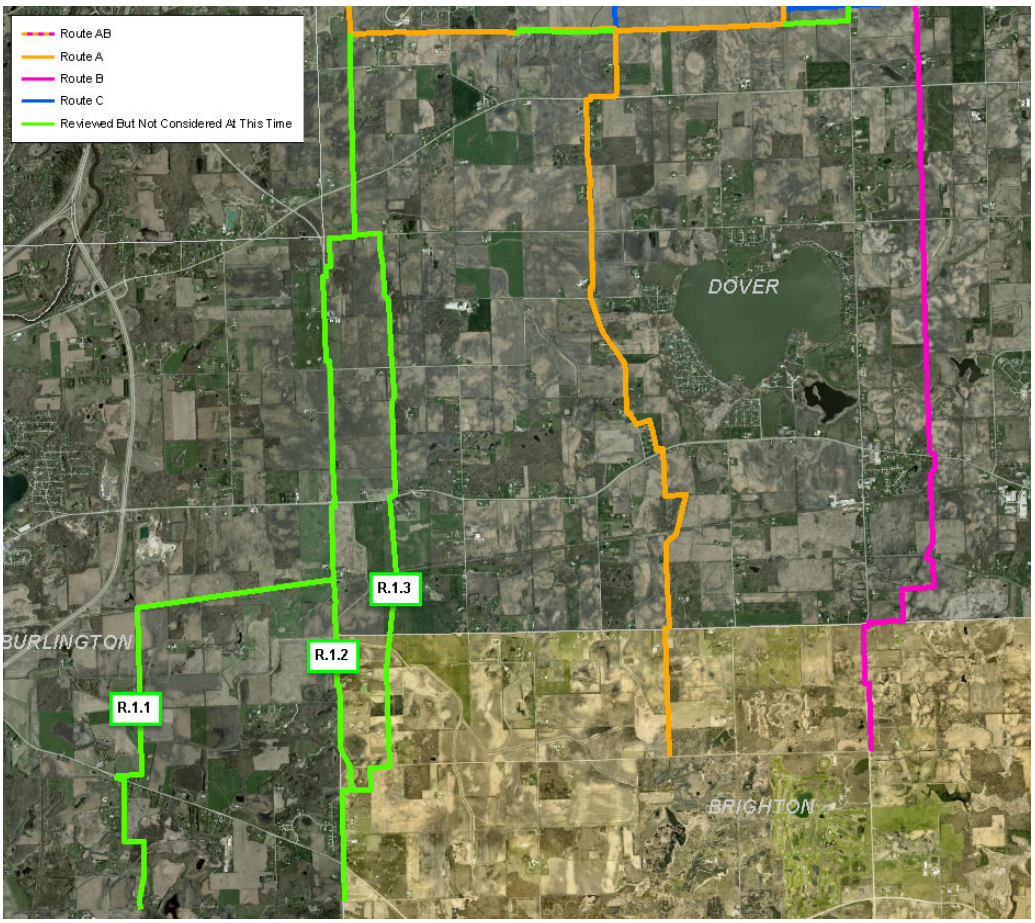
The environmental factors used to evaluate the proposed route segments include wetlands, waterways, flood zone, agricultural lands, forest lands, grasslands, rare species, cultural and archeological sites, conservation properties, and contaminated sites. Each of these has been assigned a weighted percentage based on its relative significance associated with potential environmental resource impacts or potential effects to them associated within a given route segment. Each route segment was evaluated using

desktop resources, and a ranked score was given for each criteria per segment based on potential effects to each. The weighted average was then calculated to determine each segments overall ranking. Field data, yet to be collected, will be used to update these results and will be included in the supplemental filing. The environmental score for each segment of the route can be found in **Appendix A Attachment 8.**

2.7.2 **Identify route(s) that were considered (including existing line corridors in the area and major land use boundaries) and explain why those corridors were or were not chosen.**

Reviewed routes that are no longer being considered at this time are described below.

Figure 3 - Reviewed Route 1.1

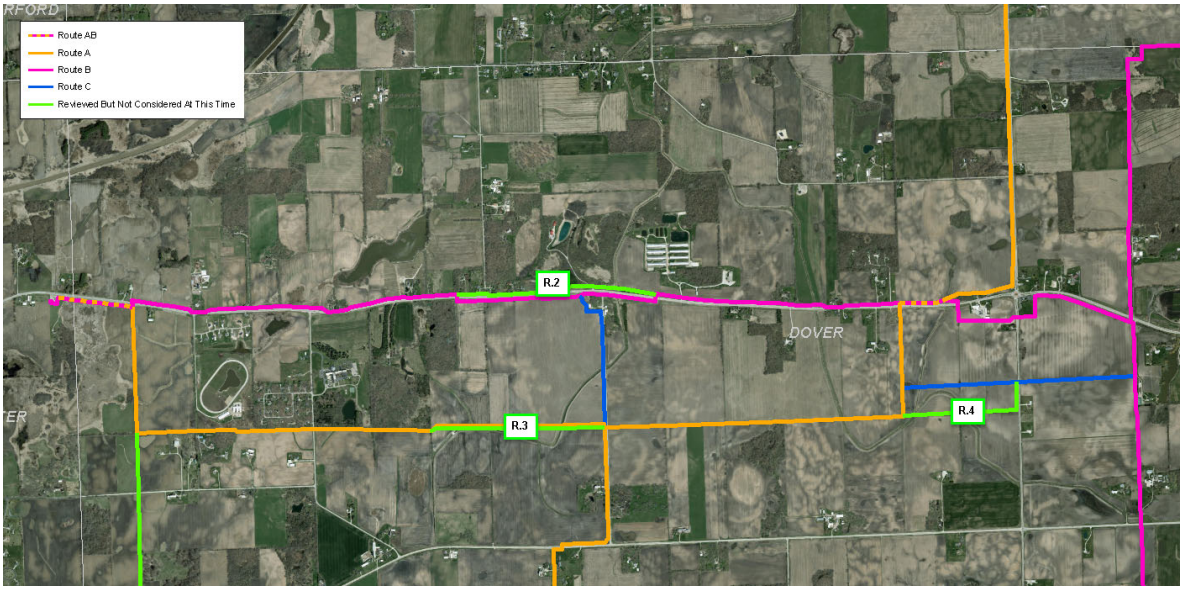


Reviewed Route R.1: Reviewed route R.1 parallels the proposed 24-inch segments, A6 and B7. Segment R.1.1 ties into the Lakeshore Lateral Project ("LLP") just south of Wheatland Rd. Segment R.1.1 was not chosen due to wet conditions that are not conducive for construction or above-ground equipment and an increase in project length.

Segment R.1.2 ties into the LLP at 312th Avenue and continues north along 312th Avenue/English Settlement Drive. R.1.3 ties into the LLP at the same location, but is routed cross-country east of 312th Avenue and English Settlement Drive.

Both segments R.1.2 and R.1.3 were not chosen due to numerous obstacles to cross at the south end and an increase in project length.

Figure 4 - Reviewed Routes R.2, R.3, R.4

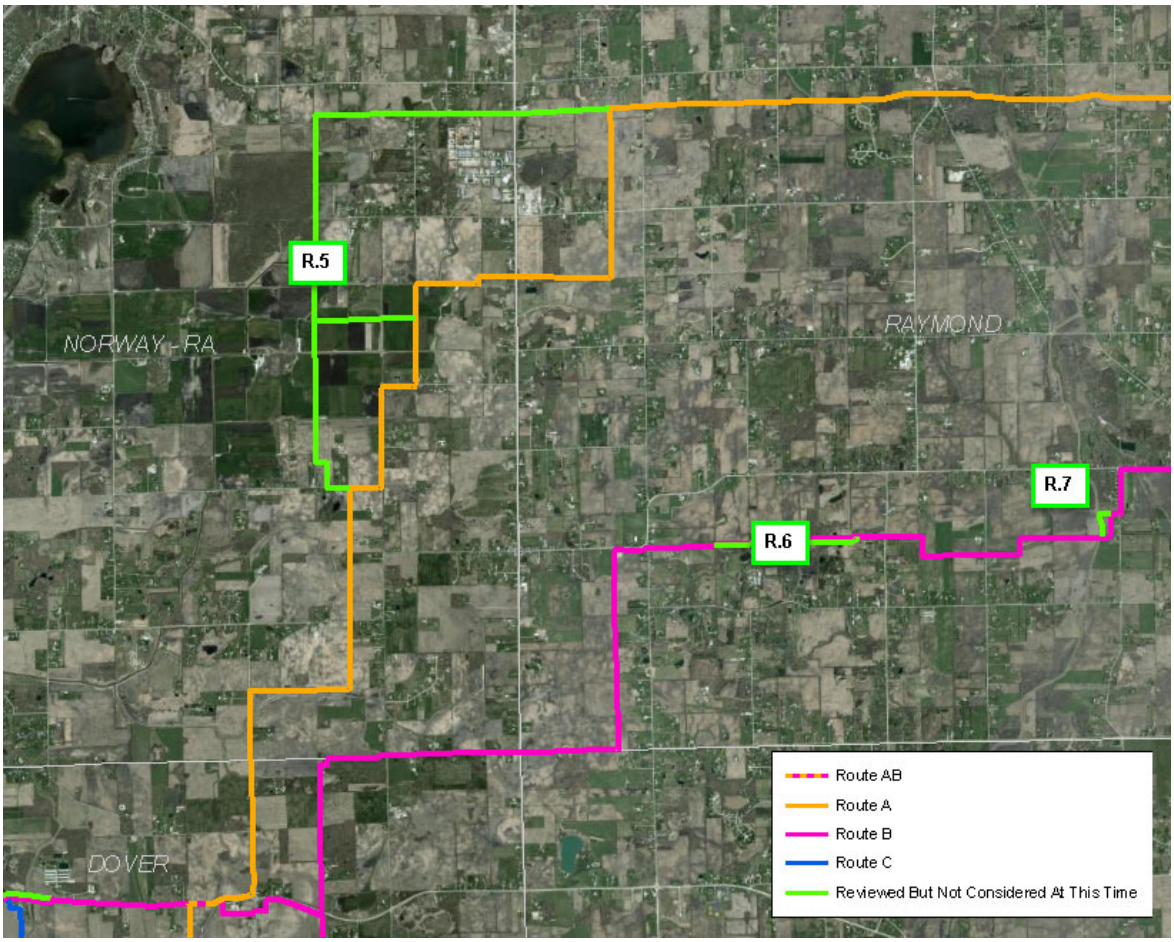


Reviewed Route R.2: This segment parallels a stretch of segments B2 and B3, routing the pipe on the north side of State Highway 20. R.2 was not chosen to avoid impacts to multiple residential and commercial properties.

Reviewed Route R.3: This segment parallels a portion of segment A1, routing the pipe and permanent easement along the parcel line, and was not chosen to avoid paralleling so close to the creek.

Reviewed Route R.4 : This segment parallels a portion of segment C2, and was not chosen to avoid crossing the stream in two locations.

Figure 5 - Reviewed Routes R.5, R.6, R.7

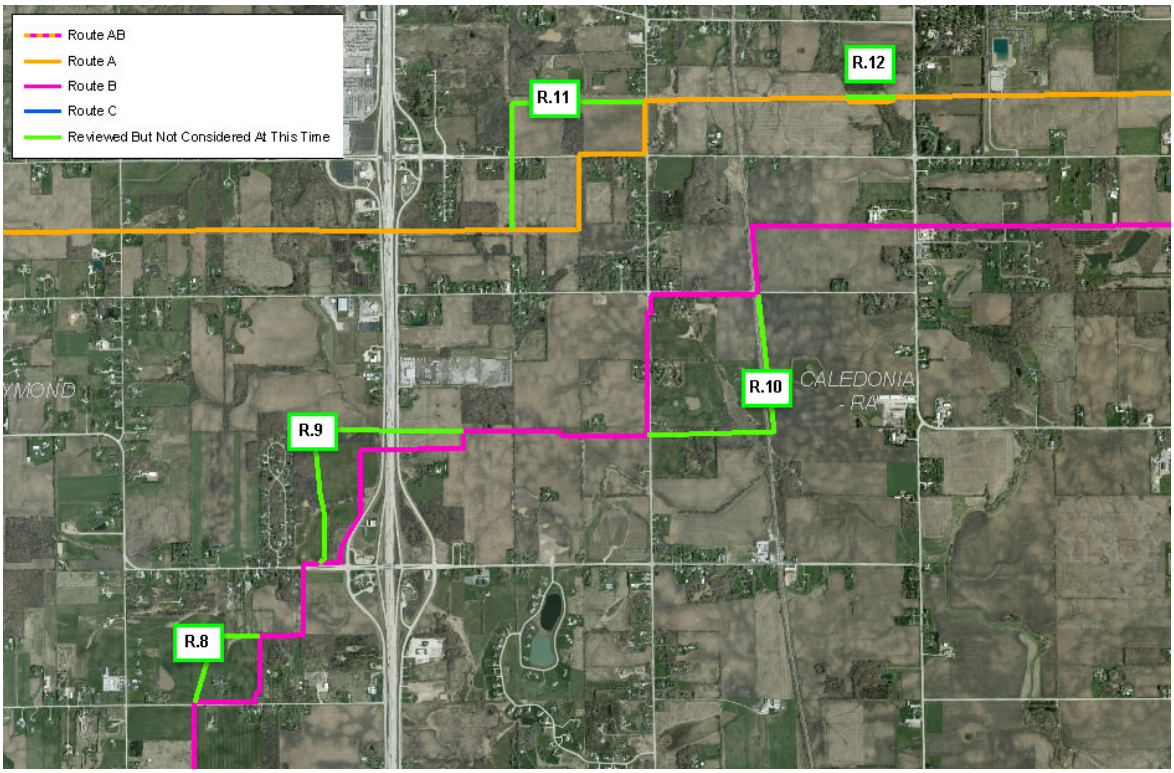


Reviewed Route R.5: This route parallels a portion of A4 from Hanson Road to 108th Street just south of 7 Mile Road. It was not chosen due to significant amounts of deep soft peat in the sod farm areas, and structures and ponds very close to both sides of the power corridor.

Reviewed Route R.6: This route parallels a portion of B5 between 108th Street and County Highway U and was not chosen due to the alignment for the drill and to avoid setting up in wetlands on the east side of the drill.

Reviewed Route R.7: This route parallels a portion of B5 just west of 51st Street and was not chosen to avoid impacts to Root River canal branch.

Figure 6 - Reviewed Routes R.8, R.9, R.10, R.11, R.12



Reviewed Route R.8: This route parallels a portion of B5 near 5 Mile Road and was not chosen due to landowner impacts of bisecting the parcel.

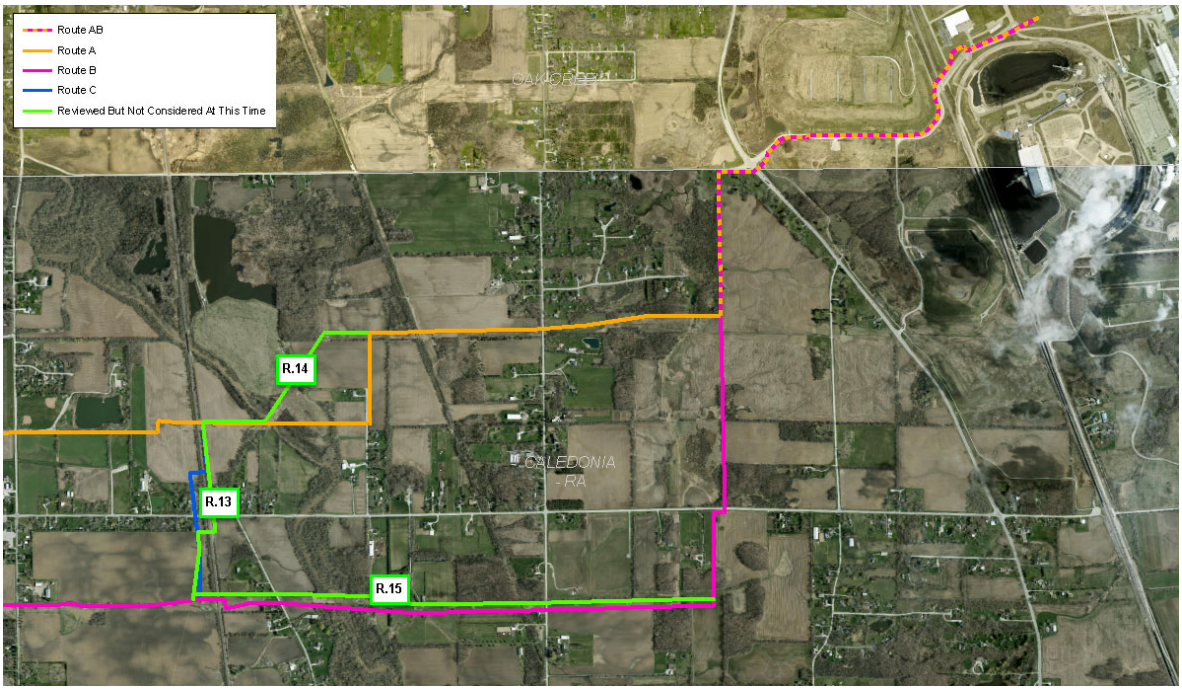
Reviewed Route R.9: This route parallels a portion of B5 where the route crosses Interstate 94. It was not chosen due to impacts to wetlands and wooded wetlands associated with the HDD across I-94.

Reviewed Route R.10: This route parallels a portion of B5 near County Highway V and was not chosen due to increased costs associated with a lengthy HDD across the wetland and railroad.

Reviewed Route R.11: This route parallels a portion of A4 and was not chosen due to limited space between structures.

Reviewed Route R.12: This route parallels a portion of A4 that crosses Husher Creek just west of State Highway 38 and was not chosen to reduce impacts to wooded wetlands.

Figure 7 - Reviewed Routes R.13, R.14, R.15



Reviewed Route R.13: This route parallels a portion of segment C3 and was not chosen to avoid impacts to wetlands north of 7 Mile Rd.

Reviewed Route R.14: This route parallels a portion of A5 near Mallard Drive. It was not chosen because of the narrow corridor constrained by the landfill, wetlands, and transmission towers.

Reviewed Route R.15: This route parallels a portion of B6. It was not chosen due to more challenging alignment for crossing the Root River and structures east of the Root River.

The Company is still evaluating the currently proposed routes and will provide more information in the supplemental filing in October 2024.

2.7.3 Describe contacts or consultations held with government entities, landowners, and other interested parties prior to application submittal regarding alternative project routes.

Consultations and open houses were held with landowners and alternate routes are currently being evaluated and may be included in the supplemental filing.

2.7.4 Identify any issues and concerns raised.

From discussions with landowners, there are several areas where the Company is evaluating if a reroute should be proposed. Should that be the determination, further information will be provided in the supplemental filing and are summarized in the table below.

Table 8 - Route Evaluations

Route Segment	General Area Description	Map Page from Proposed Plan Set (Appendix A Attachments 16-18)	Details
A1 and A2	Route A, going cross country through farm fields south of State Highway 20	Route A Pages 3, 4	The landowner provided detailed drawings of the drain tile located in the parcels impacted by the routes. There is a significant amount of drain tile crossing and parallel to the route. The Company is evaluating the impacts of the Route A segments A1 and A2 and the route options in this area.

A4	Route A, near Hanson Road and North Britton Road	Route A Page 11	The Company is evaluating a reroute on this parcel to route the pipe along the south and east parcel line. This change does not impact the project cost and will be included in the supplemental filing.
A4	Route A, following the overhead power corridor around 108th Street and 7 Mile Road	Route A Page 16	The Company is evaluating moving the route to the south side of the power corridor.
A4	Route A, near the intersection of County Highway U and Waukesha Road	Route A Page 18	The Company has relocated the above-ground valve assembly to the west side of CTH U due to road sight line safety concerns the landowner has identified. This updated valve location is shown in **Appendix A Attachment 16 Page 18 of 35** in the proposed plan set.
A5	Route A near Mallard Drive north of 7 Mile Road	Route A Page 25	The Company is evaluating options for relocating the pipe along the power corridor to the northeast to avoid impacts to the property for future subdividing. This area is challenging due to the space needed to drill across the Root River, while also avoiding the boundaries of the landfill to the north.
A6	Route A along Sunnyside Drive from State Highway 11 to Plank Road	Route A Pages 31-35	The Company is evaluating options for the Route A segment A6 between STH 11 and Plank Rd due to multiple concerned landowners.
A4	Route A near Olsen Road and North Britton Road	Route A Pages 12-13	The Company is evaluating options for the Route A segment A4 in the area of Olsen Road due to avoid constructing in areas of heavy peat.
B5	Route B near 43rd Street and Northwestern Avenue	Route B Page 16	The Company is evaluating the route at this intersection.

B5	Route B near County Highway V and 6 1/2 Mile Road	Route B Page 20	Per the landowner's request, the Company is evaluating moving the crossing of County Highway V north at the intersection of CTH V and 6 ½ Mile Road. Moving the crossing would have minimal impact to the route.
B7	Route B near State Highway 75 and 7th Street	Route B Page 28	The Company is contacting the DNR to discuss potentially rerouting the pipe onto the DNR owned parcel, per the landowner's request.
B7	Route B near State Highway 75 and County Line Road	Route B Page 29	The Company is evaluating moving the pipe in this area.
B7	Route B near Schroeder Road	Route B Page 30	The Company is evaluating routing the pipe through a different part of the parcel to avoid the significant areas of drain tile.
B7	Route B, from Church Road to State Highway 20	Route B Page 34-36	The Company is evaluating route options to address landowner concerns.

2.7.5 **Describe how the issues and concerns were addressed in the selection of the proposed routes.**

Issues and concerns are being evaluated and will be addressed, as needed, in the supplemental filing.

3.0 Project Costs

3.1 **Provide the estimated cost of the project by major plant categories or functions. Explanations of the plant accounts are included in the PSC's Uniform System of Accounts. Engineering, legal construction, inspection, and administrative costs should be included in the above stated plant accounts.**

The estimated total cost of the Project by major plant category is provided in the table below.

Table 9 - Project Costs

Account	Route A Project Cost	Route B Project Cost	Depreciation Rate
374 – Land and land rights	$7,110,000	$6,586,000	1.26%
375 – Structures and Improvements	$1,843,000	$1,843,000	1.91%
376 – Mains	$148,906,000	$152,263,000	1.79%
378 – Measuring and regulating station equipment (General)	$6,851,000	$6,851,000	3.49%
379 – Measuring and regulating station equipment (City Gate Stations)	$4,036,000	$4,036,000	3.14%
380 – Services	$80,000	$80,000	2.32%
381 – Meters	$5,316,000	$5,316,000	3.15%
Sub-total	$174,142,000	$176,975,000	
AFUDC	$9,229,280	$9,257,061	
Total Project Cost	**$183,371,280**	**$186,232,061**	

Costs include engineering, legal, construction, inspection and administrative costs. As part of this application, the Company requests authorization to accrue Allowance for Funds Used During Construction ("AFUDC") on 100% of the construction work in progress balance throughout construction. On this basis using the rate of 8.45%, the AFUDC rate authorized for WE-GO. Additionally, the Company requests that it first be required to notify the Commission upon actual project costs exceeding 10% or more of the Total Project Costs, exclusive of AFUDC, as noted in the table above.

3.2 For the proposed project, provide the following information:

The requested information can be found as follows:

3.2.1 A complete list of all FERC accounts associated with the project,

A Listing of FERC accounts associated with the Project.

- 374 – Land and land rights
- 375 – Structures and Improvements
- 376 – Mains
- 378 – Measuring and Regulating Station Equipment (General)
- 379 – Measuring and Regulating Station Equipment (City Gate Stations)
- 380 – Services
- 381 – Meters

3.2.2 The depreciation rates for each FERC account listed in 3.2.1 above.

See the table in section 3.1 for each depreciation rate associated with each plant account.

3.3 Provide the estimated annual operations and maintenance (O&M) costs of the project by major expense categories and function.

The estimated annual operations and maintenance costs of the Project by major expense categories are provided in the table below. Due to the fact that Route A and Route B are so similar in length, the estimated annual operations and maintenance costs for both routes are the same.

Table 10 - Estimated Annual O&M Costs

Account	Yearly Operating
870 - Operation supervision and engineering	$5,400
874 - Mains and services expenses	$188,000
875 - Measuring and regulating station expenses—General	$15,000
877 - Measuring and regulating station expenses—City gate check stations	$9,600
885 - Maintenance supervision and engineering	$5,800
887 - Maintenance of mains	$10,500
889 - Maintenance of measuring & regulating station equipment - General	$14,100
891 - Maintenance of measuring and regulating station equipment—City gate check stations	$11,600
Total	**$260,000**

3.4 Include a description and cost of any property being replaced or retired as a result of the proposed project.

Below are the net book values of pipe (February 2024) planned for replacement as part of this Project. The 1,286 feet of 16-inch is being retired on the power plant property to increase capacity to the Elm Road Generating Station meter set. The 10 feet of 24-inch steel is being retired for the connection into the Lakeshore Lateral. The Company is still evaluating the work to be done at the Rochester Gate Station site, and any pipe determined to be replaced or retired will be identified in the supplemental filing in October 2024.

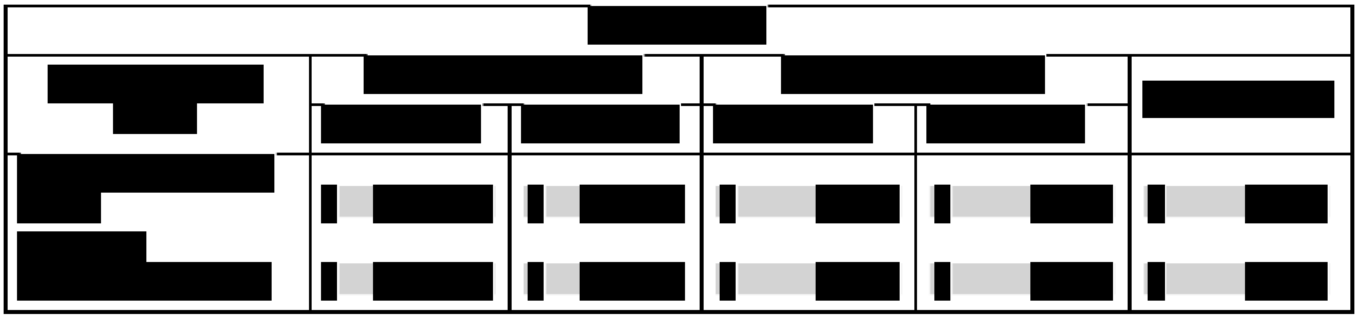
Table 11 - Proposed pipe retirement

Main Size / Material	Vintage Main	Length (feet)	Net Book Value as of February 2024
16-inch Steel	2006	1,286	$162,935.38
24-inch Steel	2021	10	$4,755.26

3.5 Provide an economic evaluation of the proposed project, including any evaluation of customer contributions under the applicant's service extension rules.

The customer contribution is still being evaluated and additional details will be provided in the supplemental filing in October 2024. The initial analysis for an indicative rate to recover the customer's allocated portion of the Project costs are shown in the table below. This analysis assumes costs for Route A. No reimbursement of the Project cost is expected from the local municipalities or other utilities.

Table 12 - Rate Summary



3.6 Provide an economic evaluation of the project alternatives, including any evaluation of customer contributions under the applicant's service extension rules.

Alternative routes and the customer contribution are both still being evaluated and additional details will be provided in the supplemental filing in October 2024. No reimbursement of the Project cost is expected from the local municipalities or other utilities.

3.7 Provide the proposed method of financing.

The cost of the Project will be met from internal sources and/or the issuance of securities.

3.8 **Provide any known credits and/or tax impacts (e.g. bonus depreciation, PTC, ITC, RTC, deferred tax, etc.) associated with the project and describe how they would be applied to the project and its financing.**

There are no known additional tax impacts or credits specific to this project compared to other gas construction projects.

3.9 **Describe the effect of the proposed project on applicant's cost of operation and its effect on the quality, reliability, and quantity of service.**

Wisconsin State Stat. §196.49(3)(b) states that the Commission may refuse to certify a project only if it appears that the project will do any of the following:

1. Substantially impair the efficiency of the service of the public utility.
2. Provide facilities unreasonably in excess of probably future requirements.
3. When place in operation, add to the cost of service without proportionately increasing the value or available quantity of service.

The Company believes that the Project will have none of these consequences. The construction of this Project is the best alternative and most advantageous means of meeting its obligation as a public utility. The Project will provide firm natural gas service at existing and planned electric generation facilities that are needed in southeastern Wisconsin. The Project will not add to the cost of service without proportionately increasing the value or available quantity of service. The Project will not result in facilities in excess of present and probable future requirements.

4.0 Detailed Information

4.1 **Provide a general description of the proposed route and project area including the percentage of the route that will be constructed within road ROWs.**

The project extends approximately 33 miles of 30-inch and 24-inch steel transmission main. The 30-inch main will extend from the existing Rochester Gate Station to the Oak Creek Power Plant site. The 24-inch main extends from the proposed 30-inch main to the Lakeshore Lateral. There is also 1,286 feet of existing 16-inch 300 psig main to be replaced with 20-inch main. See **Appendix A Attachment 1** for the project overview map. See **Appendix A Attachment 12** for a description of the route segments.

Approximately 3% of the main will be located within public road ROW for Route A. Along Route B, approximately 5% of the main will be located within public road ROW.

4.2 Route Segments

4.2.1 If the route(s) has been broken up into segments, provide the number of, names of, and total length of each segment for each proposed route.

See **Appendix A Attachment 2** for a map of the route segments. Sizes and lengths of each segment can be found in section 1.2.1.

4.2.2 For each route segment, describe and/or show the following. Figures and/or illustrations may be necessary to adequately describe the following:

4.2.2.1 Pipeline – diameter, material, wall thickness, grade (steel only), maximum allowable operating pressure, and operating pressure

See the table below for the segments and corresponding diameter, material, maximum allowable operating pressure and operating pressure. The exact material specifications (grades and wall thicknesses) to be used on this Project will be determined during the final design. Shown in the table below is a potential grade and wall thickness for each segment currently being considered.

Table 13 - Pipe Specifications by Segment

Segment	Diameter	Material	MAOP (psig)	Operating Pressure (psig)	Wall Thickness (in)	Grade
AB1	30"	ST	650	625	0.5	X65
AB2	30"	ST	650	625	0.5	X65
AB3	30"	ST	650	625	0.5	X65
AB4	20"	ST	300	275	0.375	X52
A1	30"	ST	650	625	0.5	X65
A2	30"	ST	650	625	0.5	X65
A3	30"	ST	650	625	0.5	X65

A4	30"	ST	650	625	0.5	X65
A5	30"	ST	650	625	0.5	X65
A6	24"	ST	650	625	0.375	X65
B1	30"	ST	650	625	0.5	X65
B2	30"	ST	650	625	0.5	X65
B3	30"	ST	650	625	0.5	X65
B4	30"	ST	650	625	0.5	X65
B5	30"	ST	650	625	0.5	X65
B6	30"	ST	650	625	0.5	X65
B7	24"	ST	650	625	0.375	X65
B8	24"	ST	650	625	0.375	X65
C1	24/30"	ST	650	625	0.375/0.5	X65
C2	24/30"	ST	650	625	0.375/0.5	X65
C3	30"	ST	650	625	0.5	X65

4.2.2.2 **ROW size required (width and length) and the relationship to other ROW's (e.g. new ROW, partially overlapping existing pipeline ROW, completely within existing ROW, in road ROW, etc.)**

Approximately 156,556 feet of proposed easement will be utilized for Route A and 153,470 feet of proposed easement will be utilized for Route B. Where temporary easements are required for construction, easements will be acquired where possible. Road ROW will be used for main installation where terrain or other obstacles outside of the road ROW limits the construction work space. The typical proposed permanent easement width is 50 feet; however, the final proposed easement widths along the proposed routes will be finalized during the easement negotiation process. The construction zone within the easement is anticipated to encompass the entire width of the easement. Construction will take place in the easements, where applicable, and the road ROW. Typically, a temporary construction easement of 50 feet in width will be obtained if ROW cannot be used. In areas where the project is adjacent to overhead electric power corridor, approximately 35 feet of easement would overlap the existing electric facility easement. A preliminary plan set showing the proposed easements can be found in **Appendix A Attachments 16-18**.

4.2.2.3 Valve locations

This project will include five valve assemblies. The estimate for each route includes a remote controlled valve (RCV) at each proposed valve assembly; however, after the valving and operational analysis is complete, it will be determined which locations will include an RCV. The final RCV locations will be provided in the supplemental filing. See **Appendix A Attachment 1** for proposed locations and **Appendix E Attachments 2-4** for engineering details.

4.2.2.4 Meter stations, regulator stations, gate, stations, and odorizing equipment, if any

See the table in Section 4.4 for the proposed project details for the gate, regulator station, and meter set facilities. See exhibits in **Appendix E Attachments 1–6** for engineering details.

4.2.2.5 All other proposed facilities

Two lines, a 6-inch and 20-inch line, are planned from the Rochester Lateral to the proposed OCLNG. Costs associated with these lines and additional details will be provided in the October supplemental filing.

As with all construction projects, once construction begins there is the potential for the project design to change further to accommodate unforeseen construction obstacles in the field. If said changes occur as described below, the Company will notify the Commission provided:

- A pipe location changes by more than 50 feet
- There are additional impacts to wetlands, archeological sites, waterways or occupied endangered species habitats

4.3 Easements and existing utility infrastructure - If the proposed project contains segments that would share part or all of an existing pipeline ROW, submit the following for each of those segment(s):

The proposed Project does not contain segments that would share part or all of an existing pipeline ROW.

4.3.1 Identify if existing easements would be modified to accommodate the proposed facilities, or if new easements would be pursued. Provide an example of a standard easement agreement that would be utilized for the proposed project, if approved.

Describe changes to the location or width of existing pipeline ROW.

Not applicable.

4.3.2 Provide the results of the analysis of existing pipeline easements that would be shared by application route(s) and the potential problems that may be encountered.

Not applicable.

4.3.3 State if the existing easements are to be renegotiated and/or rewritten. If so, indicate the reason (for example language modernization, change in easement size, change in pipe size, etc.).

Not applicable.

4.4 For each associated new or expanded above-ground facility, such as a meter station or regulator station, provide the following details:

A summary of the associated above ground facilities required for the Project is provided below:

Table 14 - Proposed Above Ground Facilities

Facility Name (Routes)	Location	Description of Facilities	Approx. Dimension	Map Page from Proposed Plan Set (Appendix A Attachments 16-18)	Current Zoning
Improvements to Rochester Gate Station (Route AB)	28037 Washington Ave, Waterford, WI	Pressure Regulation, ILI Launcher, RCV, Building, Odorant System	Existing Site, expanded approx. 22,500 sq.ft.	1 of 35 (A) and 1 of 36 (B)	A-2

Facility Name (Routes)	Location	Description of Facilities	Approx. Dimension	Map Page from Proposed Plan Set (Appendix A Attachments 16-18)	Current Zoning
Valve Assemblies (Routes A & B)	At various locations along routes A & B	V1A (RCV/Receiver)	50ft x 50ft	4 of 35 (A)	A-2
		V2A (RCV)	50ft x 50ft	11 of 35 (A)	A-2
		V3A (RCV)	50ft x 50ft	18 of 35 (A)	A-2
		V4A (RCV)	50ft x 50ft	22 of 35 (A)	A-2
		V5A (RCV/Launcher)	50ft x 50ft	28 of 35 (A)	A-1
		V1B (RCV/Receiver)	50ft x 50ft	5 of 36 (B)	A-2
		V2B (RCV)	50ft x 50ft	11 of 36 (B)	A-2
		V3B (RCV)	50ft x 50ft	17 of 36 (B)	A-2
		V4B (RCV)	50ft x 50ft	24 of 36 (B)	A-2
		V5B (RCV/Launcher)	50ft x 50ft	28 of 36 (B)	A-1
High Pressure Regulator Station (Route AB)	East private road ("Service Rd") and east of the Union Pacific RR	Pressure Regulation, Heater, RCV, ILI Receiver, Building	150ft x 150ft	27 of 35 (A) and 27 of 36 (B)	M-1
SCCT Meter Set (Route AB)	North private road ("Service Rd") and east of the Union Pacific railroad	Meter Set	150ft x 75ft	27 of 35 (A) and 27 of 36 (B)	M-1

4.4.1 Identify the type of new or expanded facility

See Table 14 for above ground facility type details. See **Appendix E**

Attachments 1 - 6 for additional details.

A new meter set ("SCCT Meter Set") for the proposed Oak Creek Combustion Turbines will be installed. The meter set will provide line pressure gas (off of the proposed 650 PSIG Rochester Lateral) and include over pressure protection to limit downstream pressures at or below the system's MAOP (Maximum Allowable Operating Pressure).

4.4.2 **The location of the new or expanded facility**

See Table 14 above for the proposed above ground facility locations. See **Appendix E Attachments 1 - 6** for additional details. To comply with FERC regulations, the valve spacing is no greater than 8.0 miles.

4.4.3 **The size and dimensions of the new facility or expansion of the existing facility, including any new or expanded driveways.**

See Table 14 above for the proposed above ground facility dimensions. See **Appendix E Attachments 1 - 6** for additional details.

A driveway will be proposed for each above ground facility, the Company will work with landowner, municipality, etc for final design and orientation. Existing driveways will be utilized at the Rochester Gate, one valve assembly, V2B, currently on an existing Company parcel, and the HPDR also on an existing Company parcel.

For the SCCT Meter Set, existing travel lanes on private land will be utilized for this project.

4.4.4 **The total size of the parcel the new or expanded facility will be placed on, and the orientation of the facility within the parcel**

The final orientation at each above ground facility will be determined through easement negotiation, permit requirements, and/or final design.

4.4.5 **State if the applicant owns the parcel or is in negotiations for purchase of the parcel.**

Land rights will be acquired for all above ground facilities in Table 14 except for the SCCT Meter Set, the High Pressure District Regulator Station, and Valve V2B which are proposed on Company property.

4.4.6 **Current land use and zoning of the parcel**

Current land use and zoning maps can be found in **Appendix A Attachments 4 and 5**. For the zoning specifically for the proposed above ground facilities, refer to Table 14 above.

4.4.7 **Construction procedures to build or expand the facility**

A detailed construction procedure will be developed during the final design.

4.4.8 **Describe associated permanent storm water management features that will be constructed, or expansion of or modification to existing storm water treatment facilities. Identify the locations of the point(s) of collection and discharge.**

A detailed storm water management design will be provided in the supplemental filing.

4.5 **Identify and describe the number, location, footprint, and existing land use of staging areas and any additional temporary workspaces required.**

A high level review of staging areas in the project area was completed and the potential staging areas considered for the project at this time are listed below. Additional staging area details and environmental reviews will be included in the supplemental filing. At this time, it is anticipated that up to four staging areas would be selected and approximately one to thirteen acres would be utilized at each location. The proposed location of the potential staging areas is shown on **Appendix A Attachment 11**.

A majority of these areas are comprised of developed lands including electric facilities, commercial operations, parking lots, a mowed field and an agricultural field. The Company intends to select sites where no environmental impacts will occur. Prior to final site selections, field determinations and delineations of environmental features would be completed with the intent to avoid potential impacts.

The construction contractor hired for the project may, for convenience or safety reasons, arrange alternate staging areas with private landowners. If additional staging areas are proposed at a later date, the Company will complete an assessment of the site for potential environmental and cultural impacts. Any proposed staging areas that could have an adverse impact will be rejected. If the

review indicates no adverse impact, a courtesy copy of the review with a description of the proposed construction activity will be provided to the PSCW and WDNR.

Table 15 - Potential Staging Areas

ID	Tax Key	Plan Sheet	Footprint (Acres)	Existing Land Use
1	9519996009	W Elm Rd	10.3	Vacant
2	018032107001023	Washington	9.64	Vacant
3	186032130024040	Leider Dr	3.97	Vacant
4	016041936015030	E Main Dr	13.06	Vacant
5	012042130054010	3 ½ Mile Rd	1.67	We Energies SS

4.6 If the proposed project is associated with a generation plant project, provide the following information:

This Project is associated with a generation project.

4.6.1 The builder and owner of gas system connection.

The builder and owner of the gas system connection is WE-GO.

4.6.2 The source of the gas supply (interstate pipeline connection). Rate conditions under which service is to be taken.

The source of the gas supply is the ANR Rochester Gate, the Bluff Creek Gate (Guardian and NNG) and the Bluff Creek LNG. The Company has (or will) acquire firm supply to meet its peak day requirements. At times, additional supply above the firm contracted capacity may flow into the RLP on an interruptible basis.

4.6.3 A discussion of the gas service availability to other property owners along the route.

Due to the proximity of 60 psig distribution main in the areas along the RLP route, gas service would not be available from the RLP pipeline.

4.6.4 A flow diagram of provider's system showing how the power plant at maximum gas flow rate would affect system pressures.

Flow diagrams from the system hydraulic modeling for two scenarios are attached in Appendix E. **Appendix E Attachment 8** shows the OCCT and ERGS at their full design loads with all gas coming from the Rochester ANR Gate Station. **Appendix E Attachment 9** shows the OCCT and ERGS

at their full design loads, maximizing the gas coming from Bluff Creek with the remainder coming from Rochester Gate.

4.6.5 **A description of any change to the interstate pipeline system needed to supply the proposed power plant (i.e., if the interstate pipeline must be upgraded to supply project, that must be detailed as well).**

[redacted] Additional information will be provided in the supplemental filing.

4.7 **Impact Tables**

4.7.1 **Table 1: General Route Impacts. The length of segments of the proposed routes and the requirements for new and shared ROW**

PSCW Table 1 – General Route Impacts Table is included in **Appendix F (Attachment 1)**

4.7.2 **Table 2: Land Cover**

PSCW Table 2 – Land Cover Table is included in **Appendix F (Attachment 2)**.

4.7.3 **Table 3: Federal, State, Local and Tribal Lands Excluding Road ROWs**

PSCW Table 3 – Federal, State, Local and Tribal Lands Table is included in **Appendix F (Attachment 3)**.

4.8 **For route segments that would be located within or cross Wisconsin Department of Transportation (WisDOT) ROWs, provide documentation that the proposed route is generally acceptable to WisDOT.**

This Project does cross Wisconsin Department of Transportation ROW. The Company has initiated discussions with the Wisconsin Department of Transportation (WisDOT) regarding the location and routing of the proposed project. Discussions will continue throughout the project routing and project design. Additional correspondence will be included in the supplemental filing.

4.9 **For route segments that would corridor share with town or county roads, state whether the municipality has been notified of the proposed facilities and describe the potential temporary and permanent impacts to the road.**

There are portions of the Project that are within township and/or county road ROW. The municipalities impacted by the Project have been contacted and given a brief

overview of the proposed Project. They will be contacted again during final design through our long-standing design practices. Temporary impacts to the road may include traffic control and equipment traffic, to be determined if necessary based on final route alignment and construction timeframe. There are no anticipated permanent impacts to the roads.

4.10 For route segments that would share or cross ROW with railroads, provide the following information:

Segments A4, A5, A6, AB3, B5, B6 & B7 cross railroad corridors as shown in **Appendix A Attachments 16, 17 and 18.**

4.10.1 Owner(s) of the railroad

See table below for the railroad owners.

4.10.2 Whether the railroad is active or abandoned

See table below for the current state of the railroad corridors.

4.10.3 Whether the owner of the railroad agrees to corridor sharing

All railroad corridors will be crossed and the railroad permit process will be followed.

Table 16 - Railroad Crossings

Railroad Owner	Railroad Status	Map Page of Page (From Appendix A Attachments 16-18)	Route Segment
Canadian Pacific (White River State Trail)	Abandoned	Route A 30 of 35	A6
Canadian Pacific (White River State Trail	Abandoned	Route B 31 of 36	B7
Canadian Pacific Railroad	Active	Route A 22 of 35	A4
Canadian Pacific Railroad	Active	Route B 21 of 36	B5
Union Pacific Railroad	Active	Route A 24 of 35	A4
Union Pacific Railroad	Active	Route A 27 of 35	AB3
Union Pacific Railroad	Active	Route B 23 of 36	B5

4.11 Construction Impacts

4.11.1 Discuss the proposed construction sequence for all proposed facilities.

Gas pipeline construction will begin following receipt of necessary permits. The actual construction will begin with work area preparation. Clearing and grading will be done, if necessary, to provide a level area to facilitate pipe-laying operations and transport of required construction equipment.

The main will be installed by a combination of open trench, directional drilling and jack and bore operations. Prior to trenching or boring, standard precautions including hot lining and locating will be taken to identify and avoid disturbance to any existing underground utility lines within the road ROW or on private property. Material excavated during trenching will be temporarily piled to one side of the ROW or acquired easement, with topsoil and subsoil separated, if applicable. Any material not suitable for backfill, or in excess, will be hauled to a suitable location. Best management erosion control practices will be employed to minimize erosion during trenching, piling and construction activities.

Coordination with local officials to minimize traffic disruption will take place prior to construction. The timing of construction activities will be communicated to landowners surrounding the road ROW or acquired easement to minimize disruptions. Roads or driveways crossed by open cut trenching will be restored in kind. Some ground disturbance, including brush-clearing, will be required along the proposed route to construct the pipeline. These activities are short-term, and any areas disturbed within the existing road ROW or acquired easement will be properly restored as allowed by the site but still maintain future access to the pipeline for maintenance purposes.

Pipe sections will be delivered and positioned along the road ROW or acquired easement. Pipe sections will be lined-up on supports and welded to form a continuous pipeline along the trench or at the exit pit of a bore. A qualified inspector will visually and radiographically inspect completed welds. An external coating applied at the mill will protect the piping. Following inspection, a coating will be field-applied to each weld joint or fitting. Coating on the rest of the pipe will be inspected and repaired as necessary and bores will be current drain tested to test for any coating abnormalities.

The trench bottom will be inspected to ensure it is free of rock and debris. If required, sand or soil bedding material will be placed in the trench bottom. The pipeline will be lowered into the trench using side-boom tractors. A final inspection will ensure the pipeline is properly placed on the trench bottom, that all bends conform to trench alignment, and that the pipe is not damaged. The trench will then be padded and backfilled, using trench excavation material and then will be compacted. Road ROW and acquired easement will be restored to preconstruction conditions where permissible. Surface grading will be done to re-establish natural contours. Decompaction will occur where necessary and re-vegetation will be compatible with preconstruction condition and adjacent vegetation patterns. Where tree, shrub or vegetation removal is required on easement areas, the owners may be compensated rather than restoring those items. The pipeline will be both hydrostatically tested and dried prior to being placed in service.

4.11.2 **Identify the installation method(s) that will be utilized (e.g. directional bore, opencut trench, plow, etc.).**

The basic techniques used will be open-cut trenching, horizontal directional drilling, and jack and bore.

4.11.3 **Provide a general description of project construction methods including machinery to be used, size of trench, and width/dimensions of construction disturbance zone. Include how spoil material will be managed and temporarily stored.**

Construction equipment used on these types of projects include: dozers, graders, excavators, trenchers, dump trucks, back hoes, side booms, horizontal directional drill rigs, pickup trucks, vacuum excavators, rippers, tillers, rock picking machines, welding rigs and trucks, and x-ray trucks.

Typically the size of the trench will be approximately eight feet wide by seven feet deep for 24-inch and 30-inch pipe. In areas where the soil has limited cohesion, the trench width may need to be widened to allow for benching or sloping, ensuring adequate depth of cover for the gas pipe is achieved. In agricultural lands, trench depth will be sufficiently deep enough to allow a minimum of four feet of cover over the top of the pipeline to avoid possible interference with farming equipment.

Material excavated during trenching in agricultural lands will have topsoil and subsoil separated, if applicable, as to not impede future growing seasons and promote healthy soil after restoration.

4.11.4 **Describe the construction disturbance zone and whether all work would be conducted inside the proposed ROW. Identify those areas where construction disturbance would occur outside of the proposed ROW, and the size of these areas outside of the proposed ROW.**

For the portions of the project that are constructed in agricultural lands a permanent easement of 50 feet and a temporary construction easement of 50 feet will be used. For portions of the project adjacent to road ROW and in non-agricultural lands a maximum 50 foot permanent easement and a maximum of 25 foot temporary easement will be used adjacent to the road ROW and the non-paved ROW will be utilized for temporary work space. Any variance from these standard widths can be seen in **Appendix A Attachments 16, 17 and 18.**

For some portions in the road ROW, one lane of traffic is planned to be closed with flaggers allowing traffic to pass in both directions. The closed lane of traffic and the non-paved road ROW will be utilized for temporary work space.

For some portions in the road ROW, the road is planned to be closed during construction. Local access will still be allowed to property owners along this portion of the project. A feasible detour route will be provided for all other traffic. This will be coordinated with the municipality and property owners prior to construction starting. The closed lanes of traffic and the non-paved road ROW will be utilized for temporary work space.

4.11.5 **Describe any special construction methods that would be used in/around agricultural lands, forest lands, grasslands, surface waters, or wetlands.**

Refer to Section 4.11.6.

4.11.6 **If construction methods other than open trench are proposed at any locations, indicate on the maps or aerial imagery the locations where the alternative methods would be employed and describe the alternative construction methods in detail.**

Construction methods other than open trench are planned for the Project. Proposed horizontal directional drilling (HDD) locations can be found in **Appendix A Attachments 16, 17 and 18**.

Horizontal directional drilling (HDD) method is a complex crossing technique that is used to cross environmentally sensitive areas and where minimizing excavation disturbance is crucial. The feasibility of HDD is

largely dependent on the local geologic setting. The company will conduct geotechnical studies where necessary to confirm that conditions at the anticipated HDD crossings are suitable for this technique. This information will be used to develop HDD profiles that will be included in detailed design drawings and site specific HDD summary plans. Because HDD avoids disturbances of the water body's bed and banks, it eliminates in-stream sedimentation associated with trenching. Environmental impacts associated with this technique include the potential for pressurized drilling mud, typically bentonite, to seep to the surface through natural fractures called "frac-outs". To minimize any adverse effects associated with frac-outs, Work Procedure ENVR-745 will be followed. The following points will be incorporated into the HDD process.

- The bore path will be monitored for evidence of a frac-out for prompt response.
- Appropriate containment materials will be on-site such as silt fence, hay bales and sand bags.
- Vacuum excavation will be readily available on short notice to respond quickly to a frac-out.

The HDD process contains several stages to complete a crossing. In the first stage a drill machine will be set up and a small diameter pilot hole will be drilled under the obstacle to be crossed along a prescribed profile. Electromagnetic sensors will be used to guide the drill bit. Once the pilot hole is completed, it will be enlarged, using reaming tools, to accept the pipeline. The reaming tools are attached to the drill string at the exit point of the pilot hole and are rotated and drawn back to the drilling rig. During this process, drilling mud will be continuously pumped into the hole to remove the soil cuttings and maintain the integrity of the hole. Once the hole has been sufficiently enlarged, a prefabricated section of pipe will be attached behind the reaming tool on the exit side of the crossing and pulled back toward the drill rig, completing the crossing. The Company will temporarily store used drilling mud and cuttings on site and will employ appropriate measures such as containment pits to prevent flow of the material back to wetland, waterways, or environmentally sensitive areas. After the crossing is completed, the material will be placed in an approved upland area or disposed of in accordance with applicable permits or regulations.

In the event that an HDD crossing is unsuccessful due to either bore refusal or severe frac-out problems the Company would at that point intend to cross a wetland or waterway using an open-cut trenching technique.

The railway crossings will be accomplished by jack and bore method. Typically, the pipe easement area and additional temporary work space is stripped of topsoil which is stockpiled on one side of the workspace. Bore pits are excavated on each side of the obstruction that will be crossed. The entrance and exit bore pits are generally 20 feet by 40 feet in size and range in depth from 12 to 15 feet depending on the depth of cover required for the pipe being installed. The excavated materials from the bore pits will be stockpiled next to the topsoil. If groundwater is encountered in the bore pits it will be pumped from the pits into a dewatering structure.

Access pads (such as timber mats or heavy plywood) may be placed to allow heavy tracked equipment to cross the roadway without damaging the paved surface. The auger boring machine is set up in the entrance pit and a casing pipe is jacked under the obstruction while the earth is removed by the auger rotating inside casing pipe. The new carrier pipe is attached to the casing pipe and is either pushed or pulled under the road or railway. After the new carrier pipe is installed and tied into the rest of the pipeline the bore pits will be backfilled with the stockpiled soil.

Access pads and dewatering structures will be removed and the stockpiled topsoil will be replaced to the original grade. Temporary erosion control measures will be removed after permanent erosion control measures are installed and vegetation is re-established.

Typical construction figures of dewatering structures, access pads, etc are attached in **Appendix E Attachment 10**.

Locations where HDD construction methods are planned can be found in **Appendix A Attachments 16, 17 and 18**. HDD, jack and bore, and open-cut trenching are the construction methods contemplated for this project.

4.11.7 **Describe the dewatering method(s) that may be utilized during excavation activities, such as pit/trench dewatering or high capacity wells. Identify treatment methods that would be utilized to treat the discharge, and the discharge location.**

When pit/trench dewatering is necessary, pumps and dewatering structures will be used in accordance with the Company's dewatering procedure **Appendix F (Attachment 18).**

4.11.8 **State if the new pipeline will be hydrostatically tested. If so, identify the potential locations of and methods for water withdrawal and discharge.**

The new main will be hydrostatically tested. All hydrostatic test activities

will be conducted in accordance with the WEC Hydrostatic Test Practices found in **Appendix F (Attachment 19).**

4.12 Off-ROW Access Roads

4.12.1 **Identify those areas along the proposed routes and segments where off-ROW access roads may be required. Provide the number of off-ROW access roads proposed, and an identifying name or number for each off-ROW access road**

See table below for the locations.

4.12.2 **For each access road, provide the dimensions (length and width) and construction method, including if any modifications would be needed to utilize the off-ROW access roads, such as road widening, road fill placement, or tree clearing.**

See table below for the dimensions. The construction methods for all of the access roads would include stripping the topsoil, if applicable and depending on the time of year.

4.12.3 **Discuss the reasons for the necessity for off-ROW access roads, such as topography, rivers/wetlands, etc. If protection of a natural resource is a reason, discuss how the resource would be protected during construction and operation of the proposed project.**

The reason for the proposed off-ROW access roads is to access both sides of a proposed or potential HDD location with necessary equipment or to minimize the impacts to a wetland by having the equipment traverse a non-wetland or smaller wetland area.

4.12.4 **Provide quantitative land cover information and estimated distances for the off-ROW access roads similar to the information provided in PSC Impact Tables.**

Table 17 - Access Roads

Access Road Name (Description)	Route Segment	Approximate Dimensions	Map Page of Page (From Appendix A Attachments 16-18)	Land Cover
Access Road 1 (ag field access path west of 51st St)	A4	760 feet long x 15 feet wide	Route A Page 19 of 35	Agricultural land
Access Road 2 (through farmstead lot and agricultural field north of 7 Mile Rd)	C-3	750 feet long x 15 feet wide	Route C Page 3 of 3	Agricultural land, Developed Low-intensity
Access Road 3 (Along transmission corridor east of 76th St)	A-4	1,500 feet long x 15 feet wide	Route A Page 18 of 35	Agricultural land, Wetland
Access Road 4 (along agricultural field fenceline west of Botting Rd)	B-5	1,600 feet long x 15 feet wide	Route B Page 25 of 36	Agricultural land
Access Road 5 (Agricultural fields and along fenceline south of County Road K)	B-4	3,000 feet long x 15 feet wide	Route B Page 12 of 36	Agricultural land
Access Road 6 (Roadside wetland and agricultural field west of 27th St)	B-4	260 feet long x 15 feet wide	Route B Page 18 of 36	Agricultural land

4.12.5 If the off-ROW access roads would be modified post-construction, provide details.

Modification post-construction to the off-ROW access roads includes restoring the land back to existing conditions.

5 Community Impacts

5.1 Communication with Potentially Affected Public

5.1.1 List all attempts made to communicate with and provide information to the public.

The company has had ongoing discussions through individual meetings/phone calls with local officials and impacted landowners. The company continues discussions regarding the scope of the project with land owners and

- Village of Caledonia
- Town of Raymond
- Town or Norway
- Town of Dover
- Town of Brighton
- Village of Rochester
- Racine County
- Kenosha County
- City of Oak Creek

5.1.2 Provide a description of public information meetings and who was invited.

Public information meetings were held:

- March 5, 2024 – Raymond, WI
- March 7, 2024 – Kansasville, WI
- March 13, 2024 – Caledonia, WI

A copy of the invitation can be found in **Appendix G Attachment 3**. Invites were sent to all landowners within the environmental survey area, which is typically 250 to 300 feet on each side of the proposed routes. Approximately 100 people attended the three meetings. Individuals reviewed proposed route maps, asked questions of company representatives and received information about the proposed project. Copies of materials made available at the public information meetings are in **Appendix G Attachments 4 - 9**.

5.1.3 Submit copies of the public outreach mailings and handouts.

The public outreach mailings and handouts provided prior to filing this application can be found in **Appendix G Attachments 1 - 9** and are listed below.

- Introduction to the project letter and overview map mailed Jan. 23, 2024
- Open House / public information meetings invitation mailed Feb. 15, 2024
- 2024_Brochure_We Energies_Pipeline Safety
- 2024_FAQ_Agricultural Impact Statements
- 2024_FAQ_Drain Tile
- 2024_Fact Sheet_Rochester Lateral Project
- 2024_FAQ_Three-Lift Soil Management
- 2024_FAQ_We Energies_Natural_Gas

5.1.4 **Provide electronic copies of written public comments (e.g., letters, emails, forms, etc.) submitted prior to filing the application with the PSC..**

There have been no formal written public comments submitted prior to filing of the application.

5.2 Construction Impacts to Property Owners

5.2.1 **Provide details on methods for mitigating inconveniences caused by construction to homeowners and businesses along the route. Include issues related to temporary and permanent impacts of noise, dust, curbs, sidewalks, and landscape vegetation that may be affected.**

The work will be performed to minimize impacts and inconveniences to property owners. Property owners will be provided maximum allowable driveway access during construction. If a customer's driveway or access needs to be temporarily disturbed, they will be notified in advance. Temporary driveway access will be provided after excavation and pipe installation with road plates until full restoration is complete.

Any customer landscaping disturbed will be restored or compensated accordingly as allowed to retain access for future maintenance to the pipeline.

Any impact to sidewalks or curbs will be restored to guidelines maintained by the permitting authority. Excavations in these areas will be protected with plywood, plating or snow fencing to maintain pedestrian access where permissible. Where not permissible, an alternate route will be assigned. Efforts to minimize dust, such as wet brooming and watering, will be implemented when necessary. In an effort to minimize noise impacts, work is to be

completed only during permitted hours as allowed by the permitting authority if applicable.

5.2.2 **Provide details on safety procedures, methods and timing of notification during construction and duration of construction as it affects individual property owners.**

Property owners will be contacted multiple times throughout the Project.

Property owners will be notified of the upcoming work a few weeks prior to start of construction through in-person contact, phone call and/or a letter process. They will be provided a contact to call if they have any concerns regarding the Project.

If access to a property is required, individual property owners will be contacted by a We Energies representative in advance of our accessing the property or of any work being performed.

Individual property owners will be contacted as needed during construction depending on the extent of construction impacts.

5.3 Potential Impact to Agricultural Lands

5.3.1 **Type of farming: pasture, row crops, or other type (e.g., orchards, tree plantations, cranberry bogs, etc.).**

Agricultural properties are located throughout the Project extent on both Routes A, B and C. Based on a desktop review, most of the agricultural land within the proposed routes appear to be under row-crop production comprised of corn and soybeans. Hay fields are located on both routes to a lesser extent. The crop type will be further described and mapped during the environmental field investigations (see note in Section 6.0). Route A crosses approximately 261.4 acres of agricultural lands, Route B crosses approximately 252.5 acres, and Route C crosses approximately 21.0 acres. The type and amount of agricultural lands crossed by the Project are summarized by route in **Appendix F (Attachment 2).**

5.3.2 **Any agricultural practices that may be affected by the project, such as irrigations systems, windbreaks, organic farming practices, and drainage systems (tiles, ditches, laterals).**

Specific agricultural practices affected by the Project, such as irrigation systems, windbreaks, organic farming practices, and drain tiles, will be

identified once the Project has been approved and We Energies Representatives will meet with relevant landowners.

5.3.3 Identify the number and size of parcels enrolled in farmland preservation programs and permanent agricultural or conservation easements that may be affected by the proposed project.

A total of seven parcels enrolled in the DNR Farmland Preservation program are intersected by the project area, four along Route A and three along Route B. The seven enrolled parcels account for approximately 344 acres.

5.3.4 **Specific details for mitigating or minimizing construction impacts in and around agricultural lands.**

An Agricultural Mitigation Plan (AMP) will be developed for this project and will be included in the supplemental filing.

5.3.5 **Identify any parcels of land in the project area that may impact a Drainage District, and identify the Drainage District if applicable. The following applies when any part of a project impacts a Drainage District.**

Parcels that include proposed work activity that may impact a Drainage District will be identified and this information provided in the supplemental filing.

5.3.5.1 Each County Drainage Board will be notified before undertaking any action. Additional information will be provide in the supplemental filing.

5.3.6 **Whether a DATCP Agricultural Impact Statement would be required.**

It is anticipated that an Agricultural Impact Statement will be required.

5.3.7 If the project would affect any properties used for agricultural purposes, submit one of the following, either:

An Agricultural Impact Notice (AIN) will be filed with the Wisconsin DATCP and a copy will be provided in the supplemental filing.

5.4 Parks and Recreation

5.4.1 **Identify any parks and recreation areas or trails that may be impacted by the proposed project and the owner/manager of each recreation resource.**

There are two recreation facilities within the Project area. The first, Gorney Park, which is a Village of Caledonia park located on the eastern end of Segment A-4. The second is the White River State Trail, which is owned and operated by the Wisconsin Department of Natural Resource, is located near the southern end of Segment A-6.

5.4.2 **Provide any communications with these owners/managers.**

The Company will contact the Village of Caledonia and WDNR to work towards temporary easements and access for the recreation facilities listed in 5.4.1. Additional information will be provided regarding this in the supplemental filing.

5.4.3 **Discuss how short- and long-term impacts to these resources will be avoided and minimized, including access.**

Project construction will not result in any short or long-term impacts to Gorney Park, as the project will be routed through adjacent agricultural fields just south of the park. Project construction will result in no impacts to White River State Trail, as the project plans to bore under the trail.

6.0 Natural Resource Impacts

Note: The Company will submit a supplemental filing in October 2024 to include engineering and environmental field survey data not currently available but the Company recognizes is necessary for Commission Staff's review of this application.

6.1 Forested Lands

6.1.1 **For each route segment, describe the forested lands that would be impacted by the proposed project. Include the following information in that description.**

- **Type of forest**
- **Dominant species**
- **Average age, size of trees**
- **Ownership (private, county, etc.)**
- **Use (recreation, timber, riparian habitat, etc.)**
- **Timing of clearing activities**
- **Equipment to be used.**

Forested lands are defined as any wooded landscape with greater than 20% canopy cover. This land cover excludes narrow windbreaks located between agricultural areas, but includes wooded areas adjacent to waterways. The project is located in Racine, Kenosha, and Milwaukee counties and is entirely contained within the Southern Lake Michigan Coastal ecological landscape. The remainder of Racine, Kenosha, and Milwaukee Counties are in the Southern Lake Michigan Coastal ecological landscape. Historically, these landscapes were largely forested, but much of the forested lands have been converted for agriculture and other land uses. Southern dry, dry-mesic, and mesic forests are common in the remaining upland forests; dominated largely by oaks (*Quercus* spp.), American basswood (*Tilia americana*), and sugar maple (*Acer saccharum*). Forested wetland community types in these ecological landscapes include southern tamarack swamp, hardwood swamp, and floodplain forest. Dominant canopy trees in these wetland communities include red maple (*Acer rubrum*), silver maple (*Acer saccharinum*), green ash (*Fraxinus pennsylvanica*), and tamarack (*Larix laricina*).

Forested lands were identified by desktop analysis. Forested lands along both routes generally consist of fragmented wooded areas associated with cropland, residential properties, or waterways. The forested lands appear to be primarily comprised of deciduous communities.

Forested lands will be further mapped and characterized (i.e.; woodland type, dominant species, age class, and use) during the environmental field investigations. Results from the mapping will be incorporated into the final design and construction planning.

Trees and shrubs will be cut as needed within the Project ROW to create the required workspace prior to construction. Approximately 26.2 acres of forested lands are located along Route A, 33.7 acres located along Route B, and 1.0 acre along Route C. **Appendix F (Attachment 2)** provides a breakdown of anticipated forested land impacts by route.

Regular maintenance clearing of trees and shrubs over natural gas lines is necessary to facilitate periodic inspections and surveys. A corridor along the pipeline typically 20-feet wide may be maintained in an herbaceous state (cleared of trees and shrubs) within uplands. The maintained cleared path will be no greater than 20-feet wide in forested wetland communities.

6.1.2 Managed Forest Law (MFL) and Forest Crops Law (FCL)

6.1.2.1 **Identify properties within proposed ROWs that are enrolled in the MFL or FCL programs. For properties enrolled in MFL, include the anticipated amount of forested areas that would be cleared on each property.**

Information regarding lands enrolled in the Managed Forest Law (MFL) program was obtained from the February 2018 DNR Tax Law point data. Based on this, a total of six properties enrolled in the MFL are intersected by the project area, four by Route A and two by Route B. Of these, the amount of forested areas to be cleared has not yet been determined. If additional information is acquired, an update will be provided in the supplemental filing.

6.1.2.2 **Discuss how the proposed project would affect the properties enrolled in the MFL or FCL programs and how landowners would be compensated for that impact.**

Based on the initial desktop review, one MFL property intersected by Route A may require minimal branch overhang to be cleared. Compensation for any impact has not yet been determined.

6.1.3 **Provide specific details for mitigating or minimizing construction impacts in and around forested lands.**

Construction impacts in and around forested lands will be minimized to the greatest extent practicable. This will be done by reducing the extent of the clearing area, drilling under forested wetland areas as feasible, implementing appropriate erosion and sediment controls following clearing, and by using appropriate post-construction seeding and management to reduce the spread of invasive species and encourage re-establishment of vegetative cover.

6.2 Grasslands

6.2.1 **For each route segment, describe the grasslands that would be impacted by the proposed project. Include the following information in that description.**

- **Type of grassland (prairie, pasture, old field, etc.)**
- **Dominant species**
- **Ownership (private versus public)**
- **Use (agricultural, non-productive agricultural, recreation, natural area, etc.)**

Grasslands within the proposed ROWs were identified by desktop review and appear to consist primarily of roughly maintained exotic cool-season grasses within existing road ROW. Throughout both routes, there are occurrences of old field and pasture associated with agricultural lands or adjacent to residential properties. Grasslands outside of the existing road ROW are primarily privately owned. Grasslands will be further mapped and characterized (i.e.; type, dominant species, use) during the environmental field investigations. Approximately 65.1 acres of grassland are located along Route A, 75.7 acres along Route B, and 29.3 acres along Route C. **Appendix F (Attachment 2)** provides a breakdown of anticipated grassland impacts by route.

6.2.2 **Provide specific details for mitigating or minimizing construction impacts in and around grasslands.**

Vegetation disturbance within grasslands will be temporary in nature. Soil disturbance will be limited to the trench and the pits necessary for borings. Precautionary protocols during construction (described in Section 4) and post-construction seeding and management are expected to reduce the spread of invasive species and encourage the re-establishment of vegetative cover. Based on grassland information gathered from the desktop review, it is assumed that non-agricultural grassland areas will be seeded with a standard WisDOT seed mix. If high-quality grassland areas, such as prairie, are identified during the environmental field investigations, efforts will be made to reduce impacts within these grassland areas and/or install a suitable native seed mix following construction activities.

6.3 **Identify any conservation easements that would be impacted by any aspect of the proposed project.**

The Company identified one conservation easement located along Route B that will be intersected by the project. However, the proposed implementation of HDD construction methods at this location would result in no anticipated impacts to this property.

6.4 **Identify any work occurring in floodplains or flood-prone areas. Discuss if impacts to the floodplain have been evaluated, and how impacts to the floodplain will be avoided or minimized. Provide information on any discussions that have occurred with the applicable floodplain zoning authority, and how the project will comply with local floodplain ordinance(s). Invasive Species (Uplands and Wetlands)**

FEMA flood hazard areas and impacts methods are depicted on the FEMA Flood Hazard

Map included in **Appendix F (Attachment 5)**. Flood hazard areas were derived from the FEMA National Flood Hazard Layer (NFHL). There are 14 flood hazard areas mapped on Route A and eight areas mapped on Route B. Additionally, there are two flood hazard areas on Route AB, and three on Route C.

Floodplain impacts will be temporary and disturbances will be restored to grade. Relevant floodplain authorities and local floodplain zoning ordinance permits will be obtained prior to construction as necessary.

6.5 Invasive Species (Uplands and Wetlands)

6.5.1 Describe areas where invasive species or disease-causing organisms have been observed or are a concern for the construction of the project main and associated facilities (e.g., invasive plants, oak wilt, emerald ash borer, etc.). State if invasive species surveys have occurred or will be conducted. If invasive species surveys have been conducted, provide documentation showing where surveys occurred and locations of invasive species found, indicating which species.

A field survey of the proposed Project corridor is planned during the 2024 growing season, and the general location and composition of invasive plant species present will be identified during the surveys for inclusion in the supplemental filing.

The Project is within counties that are known to contain oak wilt (*Ceratocystis fagacearum*) and tree clearing activities may increase the risk of spreading the disease. The Project is also within counties that are under State quarantine for emerald ash borer (*Agrilus planipennis*) and moving cleared ash trees from the quarantine area may increase the risk of spreading emerald ash borer.

At this time, the extent of possible tree clearing within the Project corridor is undetermined. Potential mitigation actions or timing restrictions may be discussed in the supplemental filing. The area surveyed and the locations at which these species were identified will be included in the supplemental filing as **Appendix F (Attachment 6)**.

6.5.2 Describe mitigation methods that would be used to prevent the introduction and the spread of invasive plants or disease-causing organisms and comply with Wis. Admin. Code ch. NR 40, such as cleaning of machinery, etc.

The Company is committed to minimizing the introduction and spread of invasive species, oak wilt, and emerald ash borer while constructing projects. A variety of measures are implemented by We Energies and its

contractors to minimize the potential for spreading these organisms. These measures generally follow the guidelines found in the Wisconsin Council on Forestry Manual for Invasive Species Best Management Practices (BMPs) for Transportation and Utility Rights-of-Way, as well as other state guidance documents.

BMPs that will be incorporated in the planning and construction of the proposed Project include field reconnaissance and mapping, training, avoidance of IS populations where practicable, minimizing disturbance, implementing appropriate erosion and sediment control measures, restoration, and managing the potential to introduce or spread invasive species on or in construction vehicles, equipment, and materials. The *WDNR Oak Harvesting Guidelines to Reduce the Risk of Introduction and Spread of Oak Wilt* will be followed to minimize the potential to spread oak wilt. The Company will follow the state's (DATCP and WDNR) regulations and requirements to reduce the potential to spread emerald ash borer.

6.6 Archaeological and Historic Resources

6.6.1 Provide maps and a description of all archaeological sites, historic buildings and districts, and human burial sites within the project's area of potential effect (APE). For archaeological and historic sites, the APE is comprised of the physical project area where any ground disturbing activity may occur (e.g. digging, heavy equipment movement, etc.). For historic buildings and districts, the APE consists of the distance that the project may be visible from the outside of the project area. Maps of archaeological and burial sites must be submitted confidentially.

A cultural resources review, including a comprehensive archival and literature review of architectural, historical, and archeological resources within a one-mile radius of the Project was completed and detailed in a report provided as **Appendix F (Attachment 7)**. Coordination with SHPO will be completed as necessary prior to the project start. And, a Section 106 NHPA Review will be completed for the project once federal jurisdiction has been determined.

6.6.2 For archaeological sites and historic buildings or districts within the APE, determine the boundaries, historic significance, and integrity of each resource. Additional field surveys may be required to make these determinations. In some cases, such as a landowner not granting land access, field surveys may instead be performed following the approval of a project.

Ten previously identified archaeological sites were identified within the Project study area. No further work is recommended for seven of these sites. Further investigations are warranted for three sites. None of the coincident sites are codified as burial sites; therefore, no further work is required under Wisconsin Statute §157.70.

Architecture/history investigations identified 20 previously surveyed resources within the Project study area. Of these, one has been formally determined eligible for NRHP listing, one property lacks the criteria necessary for NRHP listing, and 18 properties have not been formally evaluated. No further work is recommended relative to above-ground resources as the project will not affect the previously reported architectural historical properties.

6.6.3 **Identify the potential project effects on each resource.**

Further archaeological investigations are warranted for three sites to determine if significant resources remain extant in the project area.

6.6.4 **Describe modifications to the project that would reduce, eliminate, avoid, or otherwise mitigate effects on the resources. Examples of modifications include changes to construction locations, modified construction practices (e.g. use of low-pressure tires, matting, etc.), placement of protective barriers and warning signage, and construction monitoring.**

The Project will have no effect on any known cultural resource sites or historic properties or districts.

6.6.5 **For any human burial sites within the APE, contact WHS to determine whether a Burial Site Disturbance Authorization/Permit is required.**

The Project does not intersect any known burial sites; therefore, no Burial Site Disturbance Authorization/Permit is required from the WHS.

6.6.6 **Provide an unanticipated archaeological discoveries plan. The plan should outline procedures to be followed in the event of an unanticipated discovery of archaeological resources or human remains during construction activities for the project.**

The Unanticipated Archaeological Discoveries Plan can be found in **Appendix F (Attachment 8).**

6.6.7 **Notify Wisconsin Tribal Historic Preservation Officers of any Native American human burial sites and significant prehistoric archaeological sites within the APE. Provide copies of all correspondence.**

The Project does not intersect any known Native American human burial sites or significant prehistoric archaeological sites. Should any unanticipated relevant sites be encountered the Company will notify the Wisconsin Tribal Historic Preservation Officers.

6.7 **Restoration of Disturbed Areas**

Provide a re-vegetation and site restoration plan which discusses the following items:

6.7.1 **Type of re-vegetation proposed for impacted areas (e.g. traditional restoration seed mixes, specialty native seed mixes for restoration of high quality habitats or habitat enhancement such as seeding with a pollinator species).**

Site restoration will focus on the areas disturbed during construction. These areas may be categorized in two ways: 1) soil disturbance and 2) vegetation disturbance.

Soil disturbance will be limited to the six- to eight-foot-wide trench and the bore pits needed for HDD. Soils disturbed by vehicular rutting greater than six inches deep or from equipment traffic will be leveled and restored. Wetland soils in the workspace proximate to the construction trench may be protected from rutting and soil stockpiling by the use of timber matting, if conditions warrant, which will reduce soil disturbance and compaction.

Vegetation disturbance will be temporary in nature, with the exception of woody vegetation within the permanent easement as described in Section 7. Precautionary protocols during construction (described in Section 4) and post-construction restoration will be employed to minimize spreading invasive species. Re-seeding will be completed in areas of perennial vegetation disturbed by construction activities. Disturbed areas will be revegetated with standard WisDOT seed mixes appropriate for site conditions. Field surveys will be used to determine whether any specialty native seed mixes will be proposed to be used in any high quality habitats.

Erosion and sediment controls will be implemented as needed and maintained until final restoration and stabilization are achieved. After construction is complete, all grades will be restored to original elevations following construction, including soil segregation, proper soil replacement, and revegetation.

6.7.2 **Vegetative monitoring criteria (number of post-construction years or percent cover achieved) and methods.**

The specific re-vegetation monitoring criteria (number of year post-construction, percent cover requirements, and methods), if necessary, will be developed in cooperation with the DNR.

6.7.3 **Invasive species monitoring and management.**

Invasive species monitoring and management, if necessary, will be incorporated into the re-vegetation monitoring criteria and developed in cooperation with the DNR, as described above in 6.7.2

6.7.4 **Proposed landscaping at any associated facilities.**

Disturbed areas at associated facilities will be revegetated and monitored in conjunction with the remaining project areas.

6.8 Contaminated Sites

6.8.1 **Using the Wisconsin Remediation and Redevelopment Database (WRRD), http://dnr.wi.gov/topic/Brownfields/WRRD.html, identify any contaminated sites (open and closed) within the project area and within two miles of the project area.**

A review of the Wisconsin Remediation and Redevelopment Database was completed for an area within two miles of the Project. Maps depicting the location of contaminated sites within the two-mile radius of the Project area are included in **Appendix F (Attachment 9)**. A table identifying open and closed contaminated sites within two miles of the Project area is included in **Appendix F (Attachment 10)**. There are 12 closed contaminated sites within the Project area. There are 19 open and 154 closed contaminated sites within a 2-mile radius of the Project area. Based on the nature and locations of the closed contaminated sites,

further evaluation is necessary to determine if contamination may be encountered during construction.

6.8.2 **Using the Historic Registry of Waste Disposal Sites, http://dnr.wi.gov/topic/Landfills/registry.html, identify any Environmental Repair and Solid Waste disposal sites within the project area and within two miles of the project area.**

A review of the Historic Registry of Waste Disposal Sites was completed for an area within two miles of the Project. A table identifying Environmental Repair and Solid Waste Disposal Sites within two miles of the project area is included in **Appendix F (Attachment 11)**. There are two Environmental Repair / Solid Waste Disposal sites within the Project area. There are 27 sites located within a two-mile radius of the Project area. Based on the distance of these sites to the Project area, further evaluation is necessary to determine if contamination may be encountered during construction.

7.0 Waterway and Wetland Permitting Activities

7.1 Waterway Activities

7.1.1 **Identify the number of waterways present, including DNR-mapped waterways and additional field identified waterways. Also identify the number of times the waterway meanders in and out of the project area and indicate the number of waterway crossings.**

Waterways were identified based on desktop review of aerial imagery and the DNR 24k Hydrography Geodatabase. Waterways will be further assessed during field surveys and waterway characteristics will be collected. Waterways are depicted on the Wetlands and Waterways Map included in **Appendix F (Attachment 12)**. A total of 18 waterways are proposed to be crossed by Route A, 17 waterways and two waterbodies crossed by Route B, and three waterways crossed by Route C. **Appendix F (Attachment 14)** provides a listing of all waterways crossed by each segment of each proposed route.

7.1.2 **Identify any waterways in the project route(s) that are classified as Outstanding or Exceptional Resource Waters, Trout Streams, Wild Rice Waters, and/or Wild or Scenic Rivers.**

A portion of the Root River and associated tributaries, are classified as ASNRI Coastal Wisconsin Wetlands Stream, and intersects the project

area along Route A. The Route B option crosses a portion of the Root River that does not have the ASNRI designation. The project plans to utilize HDD construction methods for both Route options to avoid impacts to the Root River, associated tributaries, and adjacent high quality wetlands.

7.1.3 **State if you are requesting DNR staff perform a navigability determination on any of the DNR mapped waterways and/or field identified waterways that will be impacted and/or crossed by project activities. If a navigability determination is requested, provide the following information in a separate appendix with the application filing:**

- **A table with columns for:**
  - **The crossing unique ID,**
  - **Waterbody Identification Code (WBIC) for each waterway (found in the Surface Water Data Viewer or in the GIS data for the DNR mapped waterways),**
  - **Latitude and longitude for each crossing,**
  - **Waterway name,**
    Waterway characteristics from field investigation, and;
  - **Any other pertinent information or comments.**
- **Site photographs, clearly labeled with the photo number, direction, date photo taken, and crossing unique ID. A short description of what the photo is showing, and any field observation must also be included in the caption.**
- **Aerial photograph review of multiple years, including historical photos.**
- **Project map showing the following:**
  - **Aerial imagery (leaf-off, color imagery is preferred),**
  - **DNR mapped waterways (labeled with their unique ID),**
  - **Field identified waterways (labeled with their unique ID),**
  - **The location of each site photograph taken (labeled with the photo number),**
  - **The project area , and;**
  - **Call out box/symbol for each DNR mapped waterway crossing where the navigability determination is requested (labeled with their unique ID).**

A navigability determination is not being requested of the DNR on any mapped waterways and/or field identified waterways.

7.1.4 Waterway Crossings

7.1.4.1 **How many waterway crossings are proposed to be traversed with equipment and how that crossing will be accomplished (i.e. placement of temporary clear span bridges (TCSB), use of existing bridge or culvert, driving on the bed, etc.).**

The Project plans to utilize trenching construction methods through 14 waterways along Route A, 11 waterways along Route B, and three waterways along Route C. This work will adhere to the process described in Section 4.11.5 for trenching within waterways.

7.1.4.2 **How many structures are proposed to be placed below the ordinary high water mark (OHWM) of a waterway. Indicate if structures are temporary or permanent.**

No structures will be placed below the ordinary high water mark of a waterway.

7.1.4.3 **Indicate if any other waterways would be impacted and/or crossed by other construction activities regulated under Chapter 30 Wis. Stats. (i.e. placement of a new storm water pond within 500 feet of a waterway, stream relocation, staging areas, placement of riprap, etc.).**

No additional waterbody or waterway crossings are required as part of the Project.

7.1.4.4 **For underground infrastructure (e.g. pipelines) installation only: Indicate the amount of waterway crossings via underground infrastructure installation and specify the installation method (i.e. X waterways will be bored, Y waterways will be trenched, etc.)**

Along Route A, four waterways are proposed to be crossed via HDD construction methods and 14 waterways are proposed to be trenched. Along Route B, six waterways are proposed to be crossed via HDD construction methods and 11 waterways are proposed to be trenched. Along Route C, three waterways are proposed to be trenched.

7.1.5 **Provide the methods to be used for avoiding, minimizing, and mitigating construction impacts in and near waterways. This discussion should include, but not be limited to, avoiding waterways, installation methods (i.e. directional bore versus open-cut trenching or plowing),**

equipment crossing methods (i.e. for temporary access, the use of TCSB versus temporary culvert; for permanent access, the use of permanent bridge versus permanent culvert), sediment and erosion controls, invasive species protocols for equipment, etc.

The proposed HDD construction methods will avoid direct impacts to four waterways on Route A and six waterways on Route B. Limiting the HDD activities to the project ROW and implementing erosion control BMPs will minimize disturbances near these waterways. There are no proposed permanent impacts to waterways associated with this project. Because of the avoidance and minimization efforts described above, mitigation efforts are not deemed necessary.

7.1.6 **For waterways that will be open-cut trenched, provide the following:**

The number of waterways that will be open-cut trenched as part of the Project varies based on the selected route. See Section 7.1.4.4 for details.

7.1.6.1 **State if any waterways are wider than 35 feet (measured from OHWM to OHWM).**

Waterway widths will be collected during field surveys and provided in the supplemental filing.

7.1.6.2 **The machinery to be used, and where it will operate from (i.e. from the banks, in the waterway channel) and if a TCSB is needed to access both banks.**

The machinery to be used for trenching waterways may include excavators, trenchers, and vacuum excavators, which will be operated from the banks. TCSBs will be used to access both banks.

7.1.6.3 **The size of the trench (length, width, and depth) for each waterway crossing.**

Typically, the dimensions of the trench will be approximately eight feet wide by seven feet deep. The length of the trench will be determined by the width of the waterway as identified in DNR Table 1.

7.1.6.4 **Details on the proposed in-water work zone isolation/stream flow bypass system (i.e. dam and pump, dam and flume, etc.).**

The proposed in-water work zone isolation/stream flow bypass system (i.e. dam and pump, dam and flume, etc.) for each waterway crossing will be determined following collection of field data regarding specific characteristics of each waterway.

7.1.6.5 **Duration and timing of the in-stream work, including the installation and removal of the isolation/bypass system and the trenching activity.**

Waterway crossings using the above-mentioned methods will be completed in less the 24 hours for small streams and 48 hours for intermediate waterways. Dams will be in place for 24 to 48 hours unless otherwise approved by the WDNR.

7.1.6.6 **How impacts to the waterway will be minimized during in-water work (i.e. energy dissipation, sediment controls, gradually releasing dams, screened and floating pumps, etc.).**

Impacts to waterways will be minimized during in-water work by employing methods such as energy dissipation, sediment controls, gradually releasing dams, screened and floating pumps, etc.

7.1.6.7 **How the waterway bed and banks will be restored to pre-existing conditions.**

The restoration method of the waterway bed and banks to pre-existing conditions will be dependent on the pre-construction configuration. The bed and banks will be graded to match the up-stream and downstream profile and then stabilized with an appropriate seed mix and erosion control material until permanent vegetation is established.

7.1.7 **For waterways that will be directionally bored, provide the following:**

The number of waterways that will be directionally bored as part of the Project varies based on the selected route. See Section 7.1.4.4 for details.

7.1.7.1 **The location and size of any temporary staging and equipment storage.**

The temporary staging of materials and equipment associated

with HDD waterway crossings will be within the designated construction workspace at each HDD location.

7.1.7.2 **The location and size of bore pits and their distance from waterways.**

The location and dimensions of bore pits and their distance from waterway will vary based on the size and depth of the waterway, and the local geology.

7.1.7.3 **Provide a contingency plan for bore refusal and a plan for the containment and clean-up of any inadvertent releases of drilling fluid (e.g. a frac-out).**

There is a potential for inadvertent releases of drilling fluid "frac-outs" to occur. This happens when pressurized drilling mud seeps to the surface through natural fractures. Work Procedure ENVR-745, see **Appendix F (Attachment 17)**, has been developed to help reduce any adverse effects associated with frac-outs, and includes close monitoring and preparedness.

7.1.8 **For waterways that will have a TCSB installed across them, provide the following:**

7.1.8.1 **Description of the TCSB proposed, including dimensions, materials, and approaches. Verify the TCSB will completely span the waterway.**

It is assumed all waterbodies or waterways that involve open cut trenching construction methods will use temporary clear span bridges (TCSBs). See Section 7.1.4.4 for details.

Construction activities are anticipated to occur below the OHWM of 18 waterways located on Route A; 17 waterways and two waterbodies on Route B; and three waterways on Route C. Four of the waterways along Route A will be crossed using HDD construction methods. Six waterways and one waterbody along Route B will be crossed using HDD construction methods. All remaining waterways/waterbodies will be crossed by open-cut trenching. All of these waterways will require the use of TCSBs.

7.1.8.2 **State if any waterways are wider than 35 feet (measured from OHWM to OHWM), and/or if any in-stream supports will be**

used.

No streams greater than 35 feet will require TCSBs.

7.1.8.3 **State how the TCSB placement and removal will occur (i.e. carried in and placed with equipment, assembled on site, etc.) and if any disturbance would occur to the bed or banks for the installation and removal, including bank grading or cutting.**

TCSB placement will generally completely span each waterway from top of the channel to top of the channel with no support pilings in the waterway. Detailed information regarding this will be provided in the supplemental filing.

7.1.8.4 **Duration of the placement of the TCSB.**

Unless approved in a permit amendment, TCSB's will be removed no later than 14 days after the necessary waterway crossing activities has been completed for construction and initial restoration work.

7.1.8.5 **Sediment controls that will be installed during the installation, use, and removal of the TCSB's.**

Sediment controls installed during the installation, use, and removal of the TCSB's will vary for each location. Construction and placement of the TCSB's shall minimize the removal of trees, shrubs and other shoreline vegetation. Installation and removal of the TCSB's shall be conducted in a manner that prevents sediment and debris from entering the waterway. Appropriate barriers, such as geotextile fabric and silt sock, shall be installed to prevent sediment and materials from entering the waterway during use of the TCSB's.

7.1.8.6 **How the TCSB's will be inspected during use and how they will be anchored to prevent them from being transported downstream.**

TCSB's will be inspected regularly to ensure they are in proper and safe working order. TCSB openings will be inspected for debris and obstructions following any rainfall exceeding ½ inch. Any restriction of flow will be removed, and any debris will be deposited in an upland site outside of any floodplain. TCSBs will be anchored to the banks on either side by various means

including stakes and/or cables to prevent them from being transported downstream.

7.1.8.7 **State if the required 5-foot clearance will be maintained, or if the standards in NR 320.04(3), Wis. Adm. Code will be complied with.**

Information regarding whether the 5-foot clearance requirement or the standards in NR 320.04(3), Wis. Adm. Code will be utilized shall be provided in the supplemental filing.

7.1.8.8 **How the waterway bed and banks will be restored when the TCSB is removed.**

When a TCSB is removed, the waterway bed and banks will be restored to preconstruction conditions. The restoration work will begin immediately after the TCSB is removed.

7.1.9 **Describe the proposed area of land disturbance and vegetation removal at waterway crossings. Include a description of the type of vegetation to be removed (e.g. shrub, forest), and if this vegetation removal will be temporary (allowed to regrow) or permanent (maintained as cleared).**

The area of land disturbance and vegetation removal directly adjacent to a waterway will vary for each crossing. For those crossed by HDD, no disturbance or vegetation removal is expected. For those crossed by open-cut trenching, field surveys will be used to identify vegetation types and other factors to determine the most appropriate design and crossing method.

The amount of disturbance will also depend on what habitat is located at each crossing. Typically, the width of the approach to a crossing within an agricultural field will stay at the standard 100 feet. However, if there is wooded or wetland habitat, the approach is narrowed to 75 feet. From bank to bank at each crossing, the width is narrowed further to 50 feet to minimize disturbance in the waterway and on the banks. Each crossing is site dependent as to the length of the 50 foot necked down area depending on the alignment of the crossing with respect to the waterway and adjacent resource features (slope, bank, woods, wetlands, etc.).

Based on these factors, detailed plans will be developed for each trenched crossing including whether the dam/pump, sandbag dam, or dam/flume method will be used and whether any site specific restoration techniques will be required. All land disturbance will be temporary and

will typically be restored following the procedures listed in section 7.1.6.7. A permanent ROW cleared of shrub and forested communities will be maintained with a width of 20 feet near all trenched waterway crossings.

7.1.10 **If any of the following activities are proposed, provide the information as detailed on the applicable permit checklist:**

New culvert placement:

New permanent bridge placement:

New storm water pond placed within 500 feet of a waterway:

No new culvert placement, new permanent bridge placement, or new storm water pond placed within 500 feet of a waterway are proposed as part of the Project.

7.2 Wetland Activities

7.2.1 **Describe the method(s) used to identify wetland presence and boundaries within the project area (i.e. wetland field delineation, wetland field determination, conservative desktop review, etc.). If conservative desktop review was the only method used to identify the presence of wetlands, state if any areas will be field verified (and when). If a combination of methods were used, describe which project areas utilized which method. The associated delineation report and/or desktop review documentation should be uploaded to the PSC's website as part of the application filing.**

Wetland areas are depicted on the Wetlands and Waterways Map included in **Appendix F (Attachment 12)**. A total of 172 wetlands would be crossed by Route A, of which 22 will be avoided by use of HDD. A total of 162 wetlands would be crossed by Route B, of which 34 will be avoided by use of HDD. A total of eight wetlands would be crossed by Route C, of which none will be avoided by use of HDD. Desktop assessments were used to delineate wetlands, the results of which, are presented in **Appendix F (Attachment 15).** Wetland boundaries from desktop reviews will be further refined during field surveys conducted during the growing season.

7.2.2 **Identify the number of wetlands present and by wetland type, using the Eggers and Reed classification. Provide as an overall project total,**

as well as broken down by the proposed site and the alternative site(s) (if applicable) and their associated facilities.

Wetland communities have been broken down by route and classified as farmed wetland, emergent wetland, or forested wetland in **Appendix F (Attachment 14)**. These features will be further described during the field surveys.

7.2.3 Wetland functional values

7.2.3.1 **Discuss the existing functional values of the wetland present. Functional values include but are not limited to floristic diversity, fish and wildlife habitat, flood storage, water quality, groundwater discharge and recharge, public use, etc.**

Characterizations of wetland functional values within the Project are somewhat generalized due to the nature of desktop wetland analysis. Assessment of wetland functional values is based on seven categories, per WDNR Wetland Rapid Assessment Methodology (WRAM), including human use, wildlife habitat, fish and aquatic life habitat, shoreline protection, storm and floodwater storage, water quality protection, and groundwater processes. Wetland functional values determined by desktop review are summarized by route, below. These assessments will be field verified, to the extent practicable, during wetland delineation field surveys planned during the 2024 growing season.

Route A
The majority of wetlands identified along the Route A consist of man-made agricultural field drainages and enclosed agricultural depressions and are assumed to be low (degraded) quality with little use beyond channeling stormwater or surface water runoff from agricultural lands. High quality flood plain forest and wet meadow ASNRI listed wetlands are present in one location along the banks of the Root River along Route A.

Route B
Similar to Route A, a majority of wetlands along Route B consist of man-made agricultural field drainages and enclosed agricultural depressions. These areas are assumed to be low (degraded) quality. A section of the Root River also intersects Route B, however, this section is not ASNRI listed but still contains medium to high quality floodplain forest and wet

meadow wetland communities.

7.2.3.2 **Discuss how the project may impact existing functional values of wetlands.**

In general, the functional value of wetlands along both routes is heavily influenced by the history of agricultural management and development of transportation corridors. Human use is restricted, given the private ownership and public inaccessibility of these wetlands. Flood storage is also limited due to the historic changes made in the area to readily drain water from the landscape.

Existing functional values of wetlands along all proposed routes may be temporarily impacted by pipeline construction activities. Forested and shrub wetland areas that exist within the proposed ROW will be cleared and converted to herbaceous wetland communities and the ROW will be maintained in perpetuity through routine vegetation management cycles. The conversion of wooded wetlands to herbaceous wetlands may affect their functional value by changing the vegetative community, however forested and shrub areas will remain intact immediately outside of the ROW in these areas. Wildlife use may be temporarily reduced during times when construction is actively working in the area. Permanent fill in wetlands will be minimal and limited to open-cut trenching where HDD is not viable and so reduction in flood storage will be negligible. The Project will avoid or minimize wetland impacts to the extent practicable through the engineering design of the Project, the use of specific construction techniques, and through implementation of BMPs. Following construction, all temporarily impacted wetlands will be restored to pre-existing conditions through re-vegetation and restoration plans.

7.2.3.3 **Provide Wisconsin Rapid Assessment Methodology (WRAM) forms, or other assessment methodology documentation, if completed.**

Field wetland assessment methodology documentation will be provided after field surveys are completed.

7.2.4 **Identify any wetlands in the project area that are considered sensitive and/or highquality wetlands, including, but not limited to:**

ASNRI listed wetlands are present along the Root River on Route A. The Project intersects a section of the Root River that contains high quality floodplain forest and wet meadow wetland communities. The Root River also intersects Route B of the Project, however, this section of the Root River is not ASNRI listed although these wetlands are still anticipated to be medium to high quality. Additional information will be provided in the supplemental filing for items 7.2.4.1-3.

7.2.4.1 Any wetlands in or adjacent to an area of special natural resource interest (ASNRI) (NR 103.04, Wis. Adm. Code).

7.2.4.2 Any of the following types: deep marsh, northern or southern sedge meadow not dominated by reed canary grass, wet or wet-mesic prairie not dominated by reed canary grass, fresh wet meadows not dominated by reed canary grass, coastal marsh, interdunal or ridge and swale complex, wild rice-dominated emergent aquatic, open bog, bog relict, muskeg, floodplain forest, and ephemeral ponds in wooded settings.

7.2.4.3 Any wetlands with high functional values based on factors such as abundance of native species and/or rare species, wildlife habitat, hydrology functions, etc.

7.2.5 **Provide the following:**

There will be temporary impacts to wetlands on both Routes A and B, as shown in **Appendix F (Attachment 13)**. The total proposed temporary wetland impact is 12.75 acres (555,538 ft^2) for Route A, 11.16 acres (485,938 ft^2) for Route B, and 1.16 acres (50,593 ft^2) for Route C. These impacts result from trenching, temporary soil stockpiling, and timber matting. At some locations permanent conversion of forested wetlands may result from maintaining a 20-foot wide path over the pipe that is cleared of trees and shrubs. It is an anticipated that 6.4 acres (Route A), 10.6 acres (Route B), and 0.06 acres (Route C) of permanent forested wetland conversion may occur as part of the project.

Forested wetland impacts will be addressed after growing season fieldwork and addressed in the supplemental filing. There is no permanent wetland fill associated with this project. **Appendix F (Attachment 13 and 14)** summarize the wetland features identified by desktop analysis along the project ROW including feature ID, wetland type, and construction impacts. Construction activities impacting wetlands are described in more detail in section 6.5.4. A total of 22 wetlands will be crossed using HDD and 150 wetlands utilizing open-cut

trenching along Route A. For Route B, a total of 34 wetlands will be crossed using HDD and 128 wetlands utilizing open-cut trenching. For Route C, no wetlands will be crossed using HDD and eight wetlands utilizing open-cut trenching.

7.2.5.1 **The number of wetlands that would have construction matting placed within them to facilitate vehicle access and operation and/or material storage. Provide the total amount of wetland matting, in square feet**

Assume all 150 wetlands along Route A, or 128 wetlands along Rout B associated with open-cut trenching methods will require matting. The total square feet of matting has yet to be determined.

7.2.5.2 **The number of structures that would be constructed within wetlands. Indicate if structures are temporary or permanent. Provide the total square footage of permanent and temporary wetland impact for the placement of structures.**

No permanent structures will be constructed within wetlands. Temporary dewatering structures may be needed in wetlands. The number and location of these structures has yet to be determined.

7.2.5.3 **How many wetlands will have permanent fill placed within them. Provide the total amount of permanent wetland fill, in square feet.**

No wetlands will have permanent fill placed within them.

7.2.5.4 **How many shrub and/or forested wetlands would be cleared for construction. Provide the total amount of shrub and/or forested wetland conversion, in square feet.**

The amount of shrub or forested wetland conversion has yet to be determined.

7.2.5.5 **How many wetlands will be impacted and/or crossed by other construction activities regulated under 281.36 Wis. Stats. (i.e. road building activities such as grading and cutting, substation upgrades, new tie-ins, vehicle/equipment access across wetland resulting in soil mixing or soil rutting, etc.).**

No wetlands are expected to be impacted and/or crossed by other construction activities such as grading and cutting, substation upgrades, new tie-ins, vehicle/equipment access across wetlands resulting in soil mixing or soil rutting.

7.2.5.6 **For underground installation only: how many wetlands will be crossed by collection lines and specify the installation method (i.e. X wetlands will be bored, Y wetlands will be trenched, etc.).**

The number of wetlands crossed by collection lines has yet to be determined.

7.2.6 **Describe the sequencing of matting placement in wetlands and the anticipated duration of matting placement in wetlands. For matting placed in any wetland for longer than 60 consecutive days during the growing season, prepare and submit a wetland matting restoration plan with the application filing.**

Construction mats are anticipated to be used in areas where the Company intends to minimize soil disturbance in farmed wetlands as well soil and vegetation disturbance in non-farmed wetlands. They will be placed in the wetland areas of the construction right-of-way when access through wetlands is required to transport construction vehicles. Construction mats will be placed preceding construction activities within wetlands, and removed following construction activities requiring the use of the mats. It is anticipated construction mats will be in place within wetlands less than 60 consecutive days.

7.2.7 **For wetlands that will be open-cut trenched, provide the following:**

7.2.7.1 **Provide details on the total disturbance area in wetland, including how total wetland disturbance was calculated. Include the size of the trench (length, width, and depth), where stockpiled soils will be placed (i.e. in upland, in wetlands on construction mats, etc.), and where equipment will operate.**

Total wetland disturbances associated with open-cut trenching includes: 204,801 ft^2 of temporary wetland disturbance along Route A, 196,596 ft^2 along Route B, and 16,864 ft^2 along Route C. These values were calculated by multiplying the length of the disturbed area by the width (8 ft) and depth (7 ft) of the trench. Stockpiled soils will be temporarily placed in adjacent upland or if wetlands on construction mats. Equipment will operate from

construction mats. All work will be completed within permanent and temporary easements.

7.2.7.2 **Provide details on the proposed trench dewatering, including the method(s) that may be used (pumps, high capacity wells, etc.), how discharge will be treated, and where the dewatering structure will be located.**

If groundwater is encountered during trenching, dewatering will be completed using appropriately sized pumps and discharges will be treated onsite. Dewatering methods will follow procedures and practices identified in WDNR Technical Standard 1061.

7.2.7.3 **Duration and timing of the work in wetlands.**

Trenching in wetlands will be minimized to the greatest extent practicable and restored in a timely manner following completion. Duration and timing of the work in wetlands has yet to be determined.

7.2.7.4 **How the wetlands will be restored to pre-existing conditions.**

Wetlands will be restored to pre-existing conditions using the procedures described in Section 6.7. Wetland seed mixes will be utilized where applicable.

7.2.8 **For wetlands that will be directionally bored, provide the following:**

Where possible wetlands will be directionally bored under to minimize impacts. Bore pit locations and construction staging will be finalized and included in the supplemental filing. See section 4.11.6 for HDD

contingency plan for bore refusal. Additional information will be provided in the supplemental filing for items 7.2.8.1-4.

7.2.8.1 How bored wetlands and associated bore pits will be accessed.
7.2.8.2 The location and size of any temporary staging and equipment storage.
7.2.8.3 The location and size of bore pits and the distance from wetlands.
7.2.8.4 Provide a contingency plan for bore refusal and a plan for the containment and clean-up of any inadvertent releases of drilling fluid (e.g. a frac-out).

7.2.9 **For wetlands that will be plowed, resulting in a discharge of fill (soil mixing and/or soil rutting), provide the following:**

The Project will utilize HDD and open-cut trench construction methods for crossing wetlands. No wetlands will be plowed.

7.2.10 **For wetlands that will be crossed/accessed by vehicle/equipment resulting in a discharge of fill (soil mixing and/or soil rutting), provide the following:**

7.2.10.1 **Provide details on the total disturbance area in wetland, including how total wetland disturbance was calculated.**

Wetlands will be crossed with construction matting. No vehicle/equipment access through wetlands is anticipated to generate discharge of fill.

7.2.10.2 **Duration and timing of the work in wetlands.**

Duration and timing of the work in wetlands has yet to be determined.

7.2.10.3 **How the wetlands will be restored to pre-existing conditions.**

Any disturbance that does take place in wetlands will be restored to pre-existing conditions using the procedures described in section 6.7. Wetland seed mixes will be utilized where applicable.

7.2.11 **For wetland vegetation that will be cleared or cut for construction, provide the following:**

Wetland vegetation clearing activities will take place prior to and maintained following pipeline construction within shrub and forested wetland communities. A 20-feet wide ROW free of trees and shrubs will be maintained permanently over the wetland portions of the pipeline to allow for maintenance access. Wetland clearing activities will take place during frozen ground conditions when possible to prevent soil disturbance. Forested and shrub communities in wetlands will be converted to herbaceous community types within the maintained ROW, wetland communities outside of the maintained ROW will remain unaltered. Debris from clearing activities will be removed from wetland areas and removed from site or spread thinly in neighboring uplands in a manner that does not limit restoration efforts.

7.2.11.1 **Justification for why wetland trees and shrubs are proposed to be cleared, and what construction activity the clearing is associated with (e.g. transmission line installation, off-ROW access road, staging area, etc.).**

Wetland trees and brush will be cleared for the full width of the easements, approximately 100-feet wide to facilitate construction equipment access and pipeline installation. Forested and shrub communities in wetlands will be converted to herbaceous community types within the maintained ROW, wetland communities outside of the maintained ROW will remain unaltered. A 20-feet wide ROW free of trees and shrubs will be maintained permanently over the wetland portions of the pipeline to allow for maintenance access.

7.2.11.2 **The timing and duration of vegetation removal**

Vegetation will be removed and cleared in advance and concurrent with pipeline construction. Wetland clearing activities will take place during frozen ground conditions when possible to prevent soil disturbance.

7.2.11.3 **Describe the type of equipment that will be used, and if the vegetation removal will result in soil disturbance, including rutting and soil mixing.**

Vegetation will be cut at or slightly above the ground surface using mechanized mowers, sky trims, processors, harvesters, or by hand. Rootstocks will generally be left in place except in areas where stump grinding is necessary to facilitate the movement of construction vehicles. Any disturbance that does

take place will be corrected on an individual bases and restored to pre-existing conditions.

7.2.11.4 **The type of wetland and type of vegetation to be cleared.**

Forested and shrub wetland areas that exist within the easement corridor will be cleared and converted to herbaceous wetland communities.

7.2.11.5 **State if tree and shrubs that are removed will be allowed to regrow or be replanted, or if cleared areas will be kept free of trees and shrubs long-term.**

A 20-foot wide ROW free of trees and shrubs will be maintained permanently over the wetland portions of the pipeline to allow for maintenance access.

7.2.11.6 **Indicate the plan for handling and disposing of the debris (brush piles, tree trunks, wood chips, etc.) resulting from vegetation clearing in wetlands. State if debris would be removed from all wetlands to be cleared and disposed of in upland or other nonwetland locations.**

Debris from clearing activities will be removed from wetland areas and removed from site or spread thinly in neighboring uplands in a manner that does not limit restoration efforts.

7.2.11.6.1 **If debris is not proposed to be removed from all wetlands during clearing, explain why disposal in non-wetland areas is not feasible.**

Debris will be removed from all wetlands during clearing as to not impede vegetative regrowth or hydrology.

7.2.11.6.2 **If debris is not proposed to be removed from all wetlands during clearing, state how debris left in wetland will not restrict re-vegetation growth, will not alter surface elevations, and will not obstruct water flow. If wood chips will be placed in wetlands, state the depth (in inches) proposed.**

Debris will be removed from all wetlands during clearing as to not impede vegetative regrowth or

hydrology.

7.2.11.6.3 **If debris is not proposed to be removed from all wetlands during clearing, state how these wetlands will be monitored to ensure re-vegetation growth, surface elevations, and water flow are not impacted, and that the proposed depth of chip cover is adhered to. If revegetation growth becomes impeded, surface elevations become altered, and/or water flow becomes obstructed from wood chip placement, state how these impacts will be addressed and corrected, if they should occur.**

Debris will be removed from all wetlands during clearing as to not impede vegetative regrowth or hydrology.

7.2.12 **Provide the methods to be used for avoiding, minimizing, and mitigating construction impacts in and near wetlands. This discussion should include, but is not limited to, how wetland impact was first avoided then minimized by shifting the project boundary, relocating structures and/or fill outside of wetland, minimizing construction ROW through wetland, by installation methods (i.e. directional bore versus open-cut trenching, soil segregation during trenching, etc.), equipment crossing methods (i.e. use of construction matting, frozen ground conditions, etc.), sediment and erosion controls, invasive species protocols for equipment, etc. Additional guidance to prepare this discussion can be found here: https://widnr.widen.net/s/fxdd8pmqgg/paasupp3utility.**

Methods used to avoid, minimize, and mitigate construction impacts in and near wetlands include narrowing the work space in areas intended for open-cut trenching, particularly where forested wetlands are present. In locations where wetlands will be crossed using HDD construction methods, the drilling setup and bore pits will be confined to upland areas within the project ROW. A 20-foot wide path over the pipe in HDD sections will be cleared of woody vegetation to facilitate periodic inspections and surveys.

In wetland locations where pipe will be installed using open-cut trenching, the topsoil will be segregated from the subsoil and placed on timber mats as necessary. The trench will be dewatered using pumps and dewatering structures in accordance with the Company's dewatering

procedure **Appendix F (Attachment 18)**. The pipe will be lowered into the trench and weighted with either concrete coated pipe or ecobags (geotextile fabric bags filled with sand or other aggregate) as needed to keep it in place. Timber mats will be used in areas where the Company intends to reduce vegetative disturbance, segregate top soil and spoil, and support equipment.

When using HDD construction methods, there is a potential for pressurized drilling mud, typically bentonite, to seep to the surface through natural fractures resulting in inadvertent releases (IR) or "frac-outs". To reduce adverse effects associated with these, Work Procedure ENVR-745 will be followed **Appendix F (Attachment 17)**. This includes closely monitoring the bore path for evidence of an IR, having appropriate containment materials on-site such as straw bales and sand bags, and ensuring that vacuum excavation equipment is readily available on short notice.

With either method of crossing, disturbed slopes or banks will be stabilized with geotextile fabric, erosion control matting, or similar materials. Disturbed soils will be seeded, fertilized, and mulched in accordance with re-vegetation requirements and applicable permit conditions. Temporary erosion control measures will be removed when permanent erosion control measures are installed and vegetation is re-established.

7.2.13 **Indicate if an environmental monitor will be employed during project construction and restoration activities. If so, describe the monitors roles and responsibilities, frequency of visits, etc.**

One or more environmental monitors will be utilized during construction. The monitor(s) will be responsible for conducting stormwater inspections, monitoring agricultural mitigation plan compliance, and water resource permit compliance. The environmental monitor(s) will support construction personnel throughout the Project to provide direction and guidance related to regulatory compliance and implementing the planned construction measures to minimize impacts to natural resources and agricultural lands. The environmental monitor will be onsite a minimum of once per week, and more frequent as necessitated by the construction schedule, construction sequencing, and as site conditions require.

7.2.14 **Describe how all wetlands within the project area will be restored. This discussion should include details on the seeding plan, maintenance and monitoring, restoring elevations and soil profiles, restoring wetland**

hydrology, etc.

Following Project construction all wetlands within the Project area will be restored to preexisting conditions, with the exception of shrub and forested wetland communities converted to herbaceous communities within the maintained ROW. Soil removed during open-cut trenching construction will be separated by soil profile during removal and subsequently restored to the same profile following pipe installation. Wetland areas with soil disturbance will be returned to preconstruction elevations and hydrology then seeded with a wetland approved seed mix, free of invasive species, to restore preexisting plant communities.

7.3 Mapping Wetland and Waterway Locations, Impacts, and Crossings.

Provide the following map sets, as described below, for each proposed and alternative sites/routes (if applicable) and their associated components. Each map set should include an overview or index page that includes page extents for the corresponding smaller-scale map pages within the remainder of the map set. The smaller-scale map pages should show the project and resources in greater detail, include pages numbers to reference to the overview page, and have consistent scales throughout the pages.

7.3.1 Aerial Map Imagery showing the following:

- Delineated wetlands, labeled with the feature unique ID,
- Wisconsin Wetland Inventory ("Mapped Wetlands" SWDV layer) and hydric soils ("Wetland Indicators & Soils" SWDV layer), if a delineation was not conducted,
- DNR-mapped waterways, labeled with the feature unique ID,
- Field identified waterways, labeled with the feature unique ID,
- Vehicle crossing method of waterways for both permanent and temporary access, labeled by the crossing method (i.e. TCSB, installation of culvert, installation of bridge, installation of ford, use of existing culvert, use of existing bridge, use of existing ford, driving on the bed),
- ROW,
- Locations of temporary and permanent structures,
- Transmission line route,
- Segment names and nodes,
- Access paths (both on and off-ROW). Off-ROW access roads should be labeled with an identifying name or number,
- Staging areas, laydowns, and any temporary workspaces, such as crane pads(labeled with identifying name or number),

- **Footprint of new substations and/or footprint of existing substations to be expanded, and associated driveways and permanent storm water management features to be built (ponds, swales, etc.),**
- **Placement of construction matting in wetlands,**
- **Underground pipeline installation only: symbolize the line route to indicate installation method (directional bore, open-cut trench, plow etc.). This includes the excavation areas in wetlands (i.e. bore pits, open-cut trench, etc.), and;**
- **Locations of any other waterway or wetland impacting activity regulated under Wis. Stats. Chapter 30 and 281.36.**

This information is included in the Waterways and Wetlands Map in **Appendix F (Attachment 12).**

7.3.2 **A map showing which method(s) were used to identify wetland presence and boundaries within the project area (i.e. wetland field delineation, wetland field determination, conservative desktop review).**

Wetland presence and boundaries within the Project area were determined via conservative desktop review.

8.0 Endangered, Threatened, Special Concern Species, and Natural Communities

8.1 **Provide a copy of the completed ER screening and all supporting materials for all project areas, including all applicable components such as off-ROW access routes, staging areas, new substations, and expansion of existing substations.**

A certified Endangered Resource Review (ER Log #TBD) for the project was submitted on March 14, 2024. The WDNR review is ongoing as of this submittal. Once received, the finalized ER Review will be provided. The map showing the location of Natural Heritage Inventory (NHI) search area is included as **Appendix F (Attachment 16)**.

8.2 **Submit results from habitat assessments and biological surveys for the proposed project, if completed or if required to be completed per the ER screening. If surveys or assessments are required to be completed prior to construction but have not yet been completed, state when these surveys will be completed. Results from additional surveys conducted during the review of the application, prior to the start of construction, and/or post-construction must be submitted as they are completed.**

Based on the proposed Certified Endangered Resources Review, habitat and natural

community assessments, and/or biological surveys are likely required for the Project. Surveys will be conducted in 2024 during the appropriate phenological period for each species. Results from any required additional surveys conducted during the review of the application, prior to the start of construction, and/or Post-construction will be submitted to the WDNR as they are completed.

8.3 **For all project facilities and areas impacted by construction, discuss potential impacts to rare species as identified in the completed ER screening and/or field assessments.**

The Project will likely not result in any permanent impacts to rare/protected species. A High Potential Zone (HPZ) for a protected insect species and one element occurrence of a protected bird species, are within a one-mile buffer of the Project area. However, temporary impacts to the habitat of these species and/or disturbance during their breeding/nesting period may occur.

8.3.1 **For any required follow-up actions that must be taken to comply with endangered species law, discuss how each required action would affect the proposed project, and how the required action would be complied with.**

Assume the insect and/or bird are present on the site and avoid all disturbances to these specific project sites during their active/breeding season. If the project cannot completely avoid all areas of suitable habitat during this time frame construction delays may occur. Or, not assume the insect and/or bird are present on the site and prior to construction, have a qualified biologist conduct surveys to determine if suitable habitat and the species are present.

8.3.2 **For any recommended follow-up actions to help conserve Wisconsin's rare species and natural communities, discuss if and how any recommended actions would be incorporated into the proposed project.**

Recommended follow-up actions for Special Concern species and high quality Natural Communities may include voluntary time of year restrictions within suitable habitat and/or construction method alternatives. This will be assessed following field surveys to map habitat along the proposed project routes and consideration of project construction sequencing.

8.3.3 **If any recommended follow-up actions are not planned to be incorporated into project construction or operation, state the reasons why.**

In the event that Special Concern species and/or high quality Natural Communities cannot be completely avoided, measures to minimize impacts will be considered.

8.4 **Provide communications with DNR and U.S. Fish and Wildlife Service, as applicable.**

Copies of relevant communications to date, have been provided in **Appendix H (Attachment 1)**.