



December 9, 2024

Public Service Commission of Wisconsin  
 P.O. Box 7854  
 Madison, WI 53703  
 Docket #6630-CE-316

Dear Public Service Commission of Wisconsin,

We are writing to ask the PSC to strengthen the environmental impact statement on WEPCO's Paris RICE Units. As the oldest voluntary public health organization in the United States, one of the American Lung Association's four strategic imperatives is to champion clean air for all. To push for new investments in combustion-based infrastructure threatens the progress made towards clean energy commitments in Wisconsin.

A significant, costly expansion of fossil fuel burning plants should require more serious exploration of alternative investment options that complement statewide clean energy and sustainability goals. The full costs of the project to the economy and healthcare should be included in the impacts of the project and considered when comparing alternatives. Studies of the electricity sector in the U.S. have found that methane gas and fossil fuel sources cause [hundreds of billions of dollars](#) of economic losses from health costs each year. Often, the economic value of health impacts is significantly higher than retail costs or the estimated social cost of carbon. These health burdens [fall heaviest on vulnerable communities](#) but are also shared in part by everyone in the United States. A study [of the Wisconsin energy system](#) demonstrated that in-state clean energy production would reduce air and prevent health harms such as 650 ER visits, over 85,000 asthma and respiratory cases, and ~ 2,000 premature deaths, culminating in a total of \$21 billion in health savings for Wisconsin families each year while growing Wisconsin GDP by 5%. Investments in a healthier future means projects that will drive down emissions and protect the health of all Wisconsinites and a thoughtful exploration of alternatives to harmful fossil fuels.

The American Lung Association supports the phase out of fossil fuel combustion due to the myriad health and climate impacts posed by combustion. Extraction, transportation and combustion of methane releases harmful pollution that will contribute to climate change and to ground-level ozone. Air quality is significantly impacted by the effects of climate change in the form of extreme heat, drought and wildfires which amplify our public health burdens. Poor air quality contributes to a wide range of negative health impacts, including childhood asthma attacks, impaired lung function and development, lung cancer, heart attacks and strokes and premature deaths.

Kenosha County, where this project is proposed, already regularly fails to meet EPA safeguards for ozone pollution and this project would make it worse. Kenosha air monitors were listed as moderately or seriously in [nonattainment](#) several times within the last [five years](#). The American Lung Association's [2024 State of Air report](#) gives Kenosha county an "F" or a failing grade for ozone pollution.

The American Lung Association supports the transition of fossil fuel-based electricity production to clean, renewable, non-combustion technology. No community should continue to bear the burden of air pollution levels that harm public health. Wisconsin can provide reliable power to residents without jeopardizing their health. We urge the PSC to strengthen the environmental impact statement to more fully explore alternative investment strategies that better align with our shared clean air and sustainability goals. This includes exploration of non-combustion renewable power, like wind and solar, to secure a healthier and more resilient future for Wisconsin.

Sincerely,

A handwritten signature in cursive script that reads "Molly Collins".

**Molly Collins**  
 Advocacy Director  
 American Lung Association in Wisconsin

Public Service Commission of Wisconsin  
 RECEIVED: 12/9/2024 3:54:16 PM