

Cru Stubley  
Secretary to the Commission  
Public Service Commission of Wisconsin  
4822 Madison Yards Way  
P.O. Box 7854  
Madison, WI 53707-7854

Dear Secretary Stubley,

We are writing on behalf of Citizen Action of Wisconsin to express our strong opposition to the Draft Environmental Impact Statement (DEIS) for the proposed Paris RICE methane gas project. This 130 MW gas facility, estimated to cost \$303.3 million and built by WEPCO, represents yet another step backward in Wisconsin's urgent transition to a clean and affordable energy future.

Our climate is at a critical juncture. According to the Intergovernmental Panel on Climate Change (IPCC), global emissions must be reduced by 45% from 2010 levels by 2030 to avoid the most catastrophic effects of climate change. Projects like the Paris gas plant lock us into decades of additional carbon and methane emissions, undermining Wisconsin's ability to meet necessary climate targets and exposing our communities to unnecessary environmental and public health risks. Methane is a potent greenhouse gas that is 86 times more effective than carbon dioxide at trapping heat in the atmosphere over a 20-year period, further accelerating climate change. WEPCO's reliance on methane gas directly contradicts its stated goals of reducing carbon emissions by 80% by 2030 and achieving net-zero carbon emissions by 2050.

The DEIS fails to adequately address the serious health risks associated with natural gas facilities. Methane gas facilities emit pollutants like nitrogen oxides (NOx), volatile organic compounds (VOCs), and particulate matter (PM2.5), which are linked to asthma, cardiovascular diseases, and even cancer. Air pollution can negatively affect almost every organ system, including the kidneys, lungs, heart, and brain. The World Health Organization has declared climate change as the "single biggest health threat facing humanity." The National Institutes of Health reports that living near fossil fuel power plants correlates with significantly higher rates of respiratory illnesses and hospitalizations.

Kenosha County already struggles with ozone pollution, frequently exceeding federal standards. This project would exacerbate air quality issues by increasing NOx and VOC emissions, both precursors to ground-level ozone. The DEIS does not sufficiently analyze the cumulative impacts of this facility alongside existing and proposed gas infrastructure in the region. The inclusion of particulate matter (PM2.5) in the plant's emissions profile is deeply concerning given the established links between PM2.5 exposure and premature mortality. The EPA is currently considering [stricter regulations on nitrogen oxides \(NOx\) emissions](#) from power plants. If implemented, these regulations could significantly affect the viability and compliance requirements of the Paris RICE gas project.

Beyond health and environmental concerns, this project poses a significant financial burden to Wisconsin families. The plant's high cost and design lifespan of 35-40 years risks becoming a long-term investment in fossil fuel infrastructure, as the state and nation shift toward renewable energy. Ratepayers, particularly Black and Brown households already facing some of the highest energy burdens in the country, would shoulder the costs of this unnecessary and risky investment. Over the past two years, WEPCO customers have faced a 13% rate increase, while the utility continues to propose costly fossil gas projects that will contribute to higher rates and stranded assets.

Energy burden should be included in the societal and social costs of the project. The direct impact of the project spans beyond the site location and should be included in the final EIS, especially because Black and Brown We Energies customers are disproportionately negatively impacted by high energy burden. Recent analyses have found that energy burden is a central social determinant of health. Energy burden is more influential on premature mortality, self-reported health, and life expectancy than food and healthcare access. We Energies has the highest percentage of customers who are energy-burdened, are behind in payments, and have had their energy shut off compared to other utility companies in Wisconsin.

The Paris RICE project also ignores the recommendations of the Governor's Task Force on Climate Change, which explicitly advises against new fossil fuel infrastructure. Approving this project undermines the state's climate commitments and perpetuates an unsustainable reliance on fossil fuels at a time when renewable energy alternatives can meet our energy needs while reducing costs and protecting public health. The DEIS fails to fully explore clean energy alternatives to building new gas infrastructure, such as energy efficiency, battery storage, and demand response. The utility's omission of these viable alternatives highlights a lack of consideration for safer, more cost-effective solutions.

The DEIS's omission of a full Greenhouse Gas (GHG) analysis is another critical flaw. Methane gas is often misleadingly labeled as a "bridge fuel," but its lifecycle emissions rival those of coal. Without a complete assessment of this project's GHG emissions, the DEIS cannot provide a true picture of its climate impacts. Wisconsin's increasing extreme weather events—from historic floods to record heat waves—are directly tied to climate change, and projects like this will only exacerbate these costly and destructive trends.

The cumulative health, environmental, and economic impacts of this project make it a clear step in the wrong direction for Wisconsin. Investing in gas is investing in health harms, increased costs, and stranded assets, rather than prioritizing health solutions, clean energy, and economic growth. Renewable energy—including wind and solar—provides safe, cost-effective, and reliable power while creating thousands of good-paying union jobs in Wisconsin.

We urge the Public Service Commission to reject the DEIS for the Paris RICE gas project and instead require a comprehensive evaluation of cleaner, safer, and more affordable alternatives. By investing in renewable energy and energy efficiency measures, Wisconsin can protect its residents' health, lower utility costs, and build a sustainable energy future.

Thank you for considering our comments.

Sincerely,

A handwritten signature in black ink, appearing to read "Rob Kraig". The letters are cursive and somewhat stylized, with the first name "Rob" being more prominent than the last name "Kraig".

Robert Kraig  
Citizen Action of Wisconsin, *Executive Director*

A handwritten signature in black ink, appearing to read "Kat Klawes". The letters are cursive and clearly legible.

Kat Klawes  
Citizen Action of Wisconsin, *Climate Action Policy Coordinator*

A handwritten signature in black ink, appearing to read "Rafael Smith". The letters are cursive and elegant.

Rafael Smith  
Citizen Action of Wisconsin, *Organizing Director*