

No New Gas - WEC expansion talking points

Current opportunity: The Wisconsin Public Service Commission (PSC, with 3 commissioners who determine what utilities in Wisconsin can and cannot do and charge customers for) has a public comment period open on the current [We Energies rate case](#).

A rate case is a proposal about what utility companies want to build and recover costs for, and how they want to charge customers for it. This year, We Energies is asking for another significant rate increase, again with residential customers (households) bearing the brunt of the costs. Meanwhile, We Energies continues to propose more expensive fossil fuel projects and hasn't improved their low income and affordability options for people already struggling to pay bills and keep the lights on. This especially includes historically redlined communities of color and retirees on fixed income who can ill afford even their current bills.

Public comments are open NOW until October 7. You can submit comments to the PSC at <https://apps.psc.wi.gov/ERF/ERF/comment/filecomment.aspx?util=5&case=UR&num=111>

There are 4 **public hearings** where you can make your feelings and voice heard:

- October 1 at 2 pm and 6 pm in Racine and online
Cesar Chavez Community Center Gym, 2221 Douglas Avenue Racine, Wisconsin or Zoom at <https://us02web.zoom.us/my/pschearings>
- October 3 at 2 pm and 6 pm in Milwaukee and online
Great Lakes Ballroom Drury Plaza Hotel, 700 N Water Street Milwaukee, Wisconsin, or on Zoom at <https://us02web.zoom.us/my/pschearings>

Don't know where to start?

1. Read the information below to get some ideas on the many things you could talk about in your comments.
2. Register for our upcoming webinar to help explain what's occurring and prepare for the public hearings and comment period: Affordable Energy Bills: A webinar on how to stand up for fair utility bills, Tue, Sep 24, 2024; 7:00 PM - 8:00 PM, RSVP: <https://act.sierraclub.org/events/details?formcampaignid=701Po0000M3Lb7IAF>
3. Several organizations will be creating comments that you can sign on to if you find writing your own comment difficult. We'll provide links to those comment forms when they are available.
4. Questions? Contact cassie.steiner@sierraclub.org

Sample Comment

Thank you for the opportunity to comment on Docket 5-UR-111, Joint Application of Wisconsin Electric Power Company and Wisconsin Gas LLC for Authority to Adjust Electric, Natural Gas, and Steam Rates. I am asking you to deny We Energies's request to raise electric and gas rates. We Energies is not in line with the values of customers like me.

We Energies's customer's bills are already too high. The utility has some of the highest electric rates in the country, and it has the fifth highest profit rates for utilities in the country. We Energies's proposal suggests increasing its current profit margin from 9.8% to 10%. Additionally, this is the third year in a row that We Energies is approaching you to raise rates, with residential customers bearing the brunt

of the increase. Citizens Utility Board has estimated that this rate increase for residential customers like me will be 18.5% over the next two years. That is just too much! Our electric rates are already too high.

We Energies not only has high rates and high profits, but they also have some of the highest racial disparities in energy burden in the country, with majority Black and Latinx communities paying more than double the rate of energy burden as white neighborhoods. In the last rate case, the PSC ordered We Energies to explore improvements to its Low Income Forgiveness Tool (LIFT) and the creation of a Percentage of Income Payment Plan (PIPP) pilot program to help customers who are already struggling to pay their bills. LIFT has not seen the improvements, and the PIPP does not exist yet. These affordability programs should be prioritized over more profit for the utility while customers continue to suffer.

Another big concern that I have about We Energies's proposal is that the utility continues to invest in costly fossil fuel infrastructure that is not in line with carbon reduction goals of the state, country or We Energies itself. The utility's build out of 3,000 MW of gas will lock us into paying for dirty fossil fuels that harm our climate and our health. Across the country, gas plants are quickly becoming stranded assets. Many are uneconomic within a few years after they are built - much shorter than the plants' proposed lifetimes. These costs are extremely harmful to your customers and mirror the stranded asset problems that coal plants have created. We Energies customers are still paying the \$2.3 billion price tag for the company's Oak Creek "Power the Future" coal plant, also known as the Elm Road Generating Station completed in 2011, the most expensive construction project in the history of the state, while shareholders earned about a 12.5% rate of return profit on that project. Now they want customers to pay more to transition the plant, rather than retire it. I'm sick of paying for We Energies's bad investments. There are reliable clean energy solutions - and gas is not one of them!

Please deny We Energies's request to increase rates and take a critical look at the utility's profit margin and fossil fuel infrastructure project expenditures. Please also prioritize the LIFT and PIPP dockets over more fossil fuel projects like Liquefied Natural Gas, RICE Units, the transition of coal to gas and new large gas plants. We need an affordable, reliable and fossil-free Wisconsin, and you are in the position to make that happen.

WEC's proposal

- We Energies' parent company, WEC Energy Group, is planning to build new plants that total 3,000 megawatts of gas, constructing 1,300 MW of expensive new power plants and converting nearly 2,000 MW of existing coal to gas.
 - A 130 MW RICE facility located near the existing Paris Generating Station with an anticipated commercial operation date by summer 2026. This is near the Paris

solar-battery field, which We Energies is blaming rate increases on, while that technology is also serving existing and may serve new gas.

- 1,100 - 1,200 MW at the Oak Creek Power Plant campus with anticipated commercial operation dates for the units occurring from fall 2027 through June 2028
- Converting 100% of the capability at Elm Road Generating Station and Weston Unit 4 to gas. (1,863 MW total)
- These new plans are in direct contrast to WEC Energy Group's stated goal of an 80% reduction in carbon emissions by 2030 and achieving carbon-neutral status by 2050. In their filing, WEC Energy Group admits the natural gas plants will be in operation for the next 30 years – even though their stated goals say they will achieve carbon neutral status by 2050.
- The filing is asking for up to \$200M in precertification costs for building two new natural gas plants. **This means shifting the economic risk of new fossil fuels onto ratepayers and jumping over the public input process usually required to permit gas plants.**

Health

- In 2021, the [World Health Organization](#) declared climate change to be “the single biggest health threat facing humanity.”
- [Fossil gas combustion](#) is the major source of global-warming greenhouse gasses contributing to and accelerating climate change and related health harms.
- Air pollution from fossil fuel combustion is one of the [leading risk factors of premature mortality](#)
- [Air pollution can negatively affect almost every organ](#) system, including the kidneys, lungs, heart, and brain.
- Gas Harms Community and Human Health:
 - From extraction to combustion, [fossil \(methane\) gas contributes to increased health harms](#): cardiovascular and respiratory diseases, cancer, kidney disorders, and neurodevelopmental disorders such as Alzheimers.
 - The [fetus, infant, and child](#) are all very vulnerable to air pollution, but those impacted the greatest are those who are socially and economically disadvantaged.
 - [Air pollution](#) contributes to low birthweight, miscarriages, and increased infant mortality.
 - Air pollution exposure can lead to [cognitive impairments](#), increased rates of autism/ASD, and [lower academic performance](#).
 - Air pollution is a well known [trigger of asthma attacks](#) in children and it also has been found to be a cause for the disease.
 - Investing in gas is investing in [health harms](#) versus health solutions.
- Burning methane gas releases copious amounts of CO2. Increased CO2 in our environment contributes to increased levels of indoor CO2 pollution. [Short and long-term exposure to elevated CO2](#) contribute to decreased cognitive function and slower response times.
- Disadvantaged communities are historically [targeted](#) and bear the brunt of the health harms from gas pollution.
- Minority, low-income, and indigenous populations often bear a [disproportionate burden of environmental harms](#) resulting in adverse health outcomes with an increased risk of chronic disease, hospitalizations, and premature deaths.
- [National Institutes of Health research](#) shows those living in a zip code with a fuel-fired power plant experience asthma hospitalization rates 11% higher, respiratory infections rates 15% higher, and Chronic Obstructive Pulmonary Disease (COPD) rates up 17% higher than demographically similar zip codes with no power plant.

- [Premature deaths](#) from burning natural gas have already surpassed deaths from coal in 19 states. Let's not add Wisconsin to this list when we can choose a brighter path.
- Renewable energy saves lives, grows union jobs, and heals communities.
 - [Clean Energy Saves Lives](#): 100% clean energy production in Wisconsin would prevent 650 ER visits, over 85,000 asthma and respiratory cases, and ~ 2,000 premature deaths each year.
 - Renewable energy - including wind and solar power - provides safe, [cost effective](#), and [reliable](#) energy, as opposed to gas plants which have been found to be disproportionately [vulnerable to failure](#) during severe weather.
 - [Grow Union Jobs](#): Wisconsin utilities announced union commitments for solar, wind, and battery projects, bringing nearly 18,000 good-paying union jobs to Wisconsin.

Cost

- Any new fossil fuel infrastructure will be expensive and lock us into using fossil fuels for decades (infrastructure is expensive so it needs to run for decades in order to make it a worthwhile investment)
- We Energies is the most profitable utility in Wisconsin, [making more than double the revenue of the next highest utility](#).
- Racial disparities in energy burden in Milwaukee still remain among the highest in the nation. Black and Hispanic/Latinx neighborhoods each experience more than 2x the energy burden of white neighborhoods.
- We Energies has the highest percentage of customers who are energy burdened, are behind in payments, and have had their energy shut off of any utility in Wisconsin.
- The Public Service Commission ordered We Energies to develop a Percentage of Income Payment program to assist energy burdened customers with payments - and We Energies has failed to do so before asking for another rate increase.
- Building these expensive plants is a windfall for power company shareholders, but are harming rate payers.
 - We Energies customers are still paying the **\$2.3 billion price tag** for the company's Oak Creek "Power the Future" coal plant completed in 2011, the most expensive construction project in the history of the state, while shareholders earned about a 12.5% rate of return [profit on that project](#).
- We Energies continues to propose costly fossil fuel projects and rate increases. Over the past two years, We Energies has received more than a 13% rate increase, following a decades-long trend of increasing rates. The utility continues to propose costly fossil gas projects that will contribute to higher rates, result in stranded assets, and add to air pollution in the region.
- The gas (fossil fuel) industry lies and our communities pay.
 - The fossil fuel industry uses [aggressive marketing tactics](#) similar to the [tobacco industry](#), promoting gas as a natural, clean energy source, but this is a lie.

Climate

- Governor Evers and President Biden have made commitments to take action on climate change and to meet the commitment of the Paris Accord. This requires moving away from fossil fuels, including gas. The Governor's Task on Climate Change listed "Avoid new fossil fuel infrastructure" as one of the things we must do in order to stop a climate catastrophe.

- All too often, the communities least responsible for our climate pollution are facing the brunt of the crisis, and we have a responsibility to come together with the rest of the world to protect the land, air, and water on which our future depends.
- Fracked gas is a major contributor to climate altering pollution and has a negative impact on air and water quality
- Methane released through fracking and transport is 86 times more potent as a greenhouse gas than CO2 over a 20-year time frame.
- The extreme weather events we're already experiencing -- including historic droughts and floods, superstorms, record-breaking wildfires, and unprecedented coastal flooding -- will continue to rapidly worsen unless the world cuts carbon pollution

The United States Senate Committee on the Budget and the House Committee on Oversight and Accountability Democrats released a [report](#) in April of 2024 called, *Denial, Disinformation, and Doublespeak: Big Oil's Evolving Efforts to Avoid Accountability for Climate Change*. The report looked at the oil and gas industry's (referred to as "Big Oil" in the report) "decades-long deception campaign" to "deceive the public and investors about their knowledge of the effects of their products on climate change and to undermine efforts to curb greenhouse gas emissions."

The findings of the report include:

- Documents demonstrate for the first time that **fossil fuel companies internally do not dispute that** they have understood since at least the 1960s that **burning fossil fuels causes climate change and then worked for decades to undermine public understanding** of this fact and to deny the underlying science.
- Big Oil's deception campaign evolved from explicit denial of the basic science underlying climate change to deception, disinformation, and doublespeak. **The fossil fuel industry evolved from denying climate science to spreading disinformation and perpetuating doublespeak about the safety of natural gas and its commitment to reducing greenhouse gas emissions.**
- **New documents demonstrate that Big Oil companies seek to position natural gas as a "bridge fuel" between coal and cleaner, renewable energy**, while enmeshing natural gas in the U.S. energy economy for the long-term; seek to portray natural gas as a green, climate-friendly fuel, **while internally acknowledging that there is significant scientific evidence that the lifecycle emissions from gas are as bad as coal and are incompatible with scientific emissions reduction targets.**
- "Behind the scenes, industry leaders recognize the methane-related risks of natural gas while acting to lock in dangerous emissions for decades to come." This plant is an example of building new fossil fuel infrastructure to lock in emissions for decades.
- "fossil fuel companies are aware of scientific evidence suggesting that the lifecycle emissions from natural gas may be equal to those from coal. Yet, they continue to market natural gas as a safe, clean fuel that will help achieve climate goals."
- Quotes from the Statement from Chairman Whitehouse on the report:
 - The warnings are deadly serious, across multiple vectors of danger. The witnesses were often highly accomplished experts, with fiduciary responsibilities.

- I believe the economic danger is deadly real....The obvious way to fend off those economic shocks is to head off the cause of those shocks: fossil fuel emissions. To head off that cause, we have to understand: first, what is protecting enormous fossil fuel subsidies, now pegged at approximately \$750 billion per year in America; and second, what is preventing us from adopting policies to prevent the worst dangers.
- That's what this hearing is about. Because what is protecting the massive fossil fuel subsidies and what is preventing policies to reduce the danger is the same thing: the fossil fuel industry itself.
- **Our investigation uncovered public pledges undermined by private memos, public support for climate policies contradicted by private emails, rampant evidence of deception, and corporate doublespeak.**
- Rep Raskin Statement
 - Our investigation uncovered compelling evidence of aggressive industry deceit which continues to this day. The joint report and documents we discovered show how, time and again, the biggest oil and gas corporations say one thing for the purposes of public consumption but do something completely different to protect their profits. Company officials will admit the terrifying reality of their business model behind closed doors but say something entirely different, false and soothing to the public.
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