HEALTHY CLIMATE WISCONSIN
formerly known as
Wisconsin Health Professionals for Climate Action

Action Alert

The Public Service Commission (PSC) is now accepting comments on the Draft Environmental Impact Statement for the Paris RICE gas project. The deadline for comments is December 16, 2024. The PSC's role is to regulate Wisconsin utilities to ensure affordable energy bills and protect the public. **Add your voice to the growing number of Wisconsinites who are calling upon the PSC to protect public health over corporate wealth.**

What are they proposing? The Paris project is a 130 MW RICE "Reciprocating Internal Combustion Engine" methane gas facility proposed by WEPCO. WEPCO is the parent company of We Energies and the most profitable utility in our state. If approved, it would be built in Kenosha in mid-2026 with an estimated cost of $303.3 million.

These comments are specifically on the draft Environmental Impact Statement (DEIS) prepared by the PSC and DNR. This is a chance to push both agencies to consider the environmental, social, and health impacts of the project.

There will be a separate period for comments directed to the PSC on the merits of this project at a later time. This project is one of several recently proposed gas projects for Wisconsin, so stay tuned for more opportunities.

Save the date for the next public hearing on the Paris project (Docket # 6630-CE-316): February 5, 2025, at 2 pm and 6 pm in person in Union Grove or online via Zoom.

Click here to submit your comment

Any comment, even if you only have time for a sentence or two, is helpful!

Example Comment:
“My name is [name], and as a concerned [your role, e.g., parent, healthcare professional], I urge the PSC to strengthen their environmental impact statement on the Paris project by considering the following:

The current draft only mentions asthma as a health impact of air pollution. However, methane gas is linked to other serious health issues, including cardiovascular impacts, neurodevelopment disorders, cognitive impairments, low birth weight, and cancers. Air quality is a leading risk factor for premature mortality, with deaths from burning natural gas surpassing those from coal in 19 states. The full costs of this project to health and the economy must be included in the impact assessment, as studies show that methane gas and fossil fuels cause hundreds of billions in economic losses annually.

Kenosha County already struggles with ozone pollution, and this project would worsen the situation. The DEIS acknowledges that ozone is controlled by lowering NOx and VOC emissions, both of which this plant would release. Additionally, PM2.5 is listed as a pollutant, but the updated NAAQS for PM2.5 is not included, despite there being no safe level of particulate matter for health.

Energy burden should also be considered, particularly for Black and Brown We Energies customers, who face some of the highest rates in the nation. This project poses a risky investment that could raise future utility bills.

According to the World Health Organization, climate change is “the single biggest health threat facing humanity,” making a full Greenhouse Gas (GHG) analysis essential. Extreme weather events in Wisconsin are already impacting our quality of life and increasing costs.

While meeting rising energy demands is crucial, “natural gas” is not the only solution. WEPCO currently generates over a third of its power from natural gas and only about 6% from renewables. A true commitment to resource diversification must prioritize renewable energy and energy efficiency, which can meet our needs while creating sustainable jobs and reducing utility costs.

Energy companies are aware of these facts and are prioritizing profits over community health. I ask that the PSC fulfill its obligation to protect the public by strengthening their analysis of this proposal.”

Talking Points

We are asking Wisconsin agencies to strengthen the environmental impact statement on the Paris RICE Units by:

Taking Hazardous Health Harms and Air Pollution Into Account

- We were grateful to see health concerns of fossil fuels generally referenced in the DEIS, but the only health impact named was asthma and U.S. and Wisconsin-based studies are notably missing. From extraction to combustion, fossil (methane) gas contributes to increased health harms: cardiovascular and respiratory diseases, cancer, kidney disorders, neurodevelopmental disorders such as Alzheimer's, cognitive and behavioral issues, and lower academic performance. Air pollution can negatively affect almost every organ system, including the kidneys, lungs, heart, and brain, and it contributes to low birth weight, miscarriages, and increased infant mortality. Ultimately, air quality is a leading risk factor for premature mortality and premature deaths from burning natural gas have already surpassed deaths from coal in 19 states.
    - 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.

- 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 each year. Often, the economic value of health impacts was significantly higher than retail costs or the estimated social cost of carbon. 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%.

- 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 DEIS acknowledges on pg. 54 that ozone, which is listed as a criteria pollutant due to its human health harms, is controlled by lowering NOx and VOC emissions. This plant would release both, but the DEIS doesn't take into account ozone regulations or nonattainment in the section on air quality considerations.

- PM2.5 is listed as one of the pollutants that this plant will release, but on pages 56-57, the air quality standard for PM2.5 is not listed. The updated NAAQS for PM2.5 should be included as this is a criteria pollutant that is extensively linked to a range of serious and sometimes deadly illnesses. In fact, medical research shows there is no safe level of

particulate matter for human health, and all modifiable sources, like our electricity sector, should be addressed to lower disease and early deaths.

- Tighter regulations on NOx from power plants are currently being considered by the EPA and could impact this project.

- Consider the cumulative impacts of gas infrastructure on the area, including other open dockets and the transition of the Elm Road coal plant to gas generation, adding additional gas megawatts and air pollution to the region.

Including Energy Burden and Higher Utility Costs

- 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 experience some of the highest rates of energy burden in the nation.
    - Building these expensive plants is a windfall for power company shareholders, but is harming Wisconsin families.
    - Recent analyses have found that energy burden is a central social determinant of health. It was more influential on premature mortality, self-reported health, and life expectancy, than food and healthcare access (Reames et al., 2021).
    - We Energies has the highest percentage of customers who are energy-burdened, are behind in payments, and have had their energy shut off more than any other utility in Wisconsin.

- This is a risky investment that could end up raising utility bills. The DEIS states that the plant is designed to operate for 35-40 years (pg. 49), but the PLEXOS model provided by the utility only goes 30 years (pg. 20). An extra 5-10 years is crucial when it comes to the risk of stranded assets and climate change. Wisconsin families are currently on the hook for WEPCO's billion dollar mistake on the Oak Creek Coal plant, which became a stranded asset that customers still have to pay for. The PSC should be exceedingly cautious about additional fossil fuel investments that carry a similar risk. Additionally, 30 years, and especially 35-40 years puts WEPCO far past their own stated climate goals for being carbon neutral by 2050 and light years behind established climate recommendations for scientific boards and organizations.

Analyzing the Climate Impacts

- The EIS should include a Greenhouse Gas (GHG) analysis that explores the climate change impacts of additional fossil fuel generation. We're glad to see that vulnerable communities and populations were included, but the environmental, economic, and health impacts of additional greenhouse gas emissions were identified in the greenhouse gas section of the report.
    - The extreme weather events we're already experiencing -- including historic droughts and floods, superstorms, record-breaking wildfires, and heat -- will

continue to worsen unless we cut greenhouse gas emissions rapidly. These extreme weather events damage our quality of life, housing, the economy, and increase utility outages (reliability) and costs when infrastructure is damaged.
    - In 2021, the World Health Organization declared climate change to be "the single biggest health threat facing humanity."

- Fully and more accurately representing the Governor's Task Force on Climate Change recommendations. Page 58 quotes the Governor's Task Force on Climate Change report, but fails to acknowledge the report's recommendation 47: avoid all new fossil fuel infrastructure, including "avoid all new fossil fuel infrastructure for electricity generation" and "avoid any new natural gas plants."
    - Internal memos show that fossil fuel companies are aware of scientific evidence suggesting that the lifecycle emissions from 'natural' gas may be equal to those from coal. Gas is not a climate solution and this plant is an example of building new fossil fuel infrastructure that will lock us into decades of dangerous emissions.

Fully Evaluate Better, Safer, and Cheaper Options

- Require proof from the utility that a clean energy package with battery storage couldn't meet the needs expressed, and require additional analysis of clean energy and battery storage alternatives. The utility did not model safer alternatives such as demand response and energy efficiency that can meet energy needs with fewer public health impacts.
    - Alternatives provide safe, cost-effective, and reliable energy, as opposed to gas plants which have been found to be disproportionately vulnerable to failure during severe weather.
- Better analyze the "resource diversity" needs stated by the utility. Right now resource diversity is stated as the primary reason for the project, but the utility generates more than a third of its power from natural gas, and only around 6% from renewable energy sources. A true commitment to resource diversification would include the expansion of renewable energy.

- It is a conflict of interest that utility modeling is not independently verified by the PSC, the agency mandated to regulate utilities to keep bills affordable and the public safe.

These talking points were developed in coalition with the Sierra Club of Wisconsin.