BEFORE THE
PUBLIC SERVICE COMMISSION OF WISCONSIN

Joint Application of Wisconsin Public Service Corporation
and Wisconsin Electric Power Company
for authority to Construct the Weston Reciprocating
Internal Combustion Engine Project in the Villages of
Rothschild and Kronenwetter, Marathon County, Wisconsin

5-CE-153

POST-HEARING BRIEF OF CLEAN WISCONSIN

INTRODUCTION

Clean Wisconsin intervened in this proceeding on behalf of itself and its approximately 20,000 members and supporters in the state of Wisconsin, many of whom live and purchase utility services in the service areas of Wisconsin Public Service Corporation and Wisconsin Electric Power Company (together “Joint Applicants”). Joint Applicants request a Certificate of Public Convenience and Necessity (“CPCN”) (the “Application”) to construct the Weston Reciprocating Internal Combustion Engine (“RICE”) Project (“Proposed Project”) in the Villages of Rothschild and Kronenwetter. The Commission should reject Joint Applicants’ request because they have not met their burden of demonstrating a need for the Proposed Project or that the Proposed Project is in the public interest, because the Proposed Project does not comply with Wisconsin’s Energy Priorities Law, and because the Application relies on an Environmental Assessment (“EA”) that failed to fully assess the Proposed Project’s environmental impacts.

LEGAL BACKGROUND

Joint Applicants seek a CPCN to construct a large generating facility under Wis. Stat. §§ 1.11, 1.12, 196.025, 196.41, and Wis. Admin. Code chs. PSC 4 and 111. (Prehearing Conf.
Mem., 7/9/21.) The Commission may only grant Joint Applicants’ request allowing construction and operation of the Proposed Project if the Commission determines, among other issues, that “[t]he proposed facility satisfies the reasonable needs of the public for an adequate supply of electric energy…. “ Wis. Stat. §196.491(3)(d)2. The Commission must also determine that “[t]he design and location or route is in the public interest considering alternative sources of supply, alternative locations or routes, individual hardships, engineering, economic, safety, reliability and environmental factors…. “ Wis. Stat. §196.491(3)(d)3 (going on to limit the Commission’s consideration of air pollution impacts because those impacts are regulated directly by the Department of Natural Resources).

Joint Applicants have the burden to show each prerequisite for a CPCN is satisfied. See Village of Menomonee Falls v. Dept. Natural Resources, 140 Wis. 2d 579, 605 (Ct. App. 1987) (the party seeking permission has the burden of proof); Sterlingworth Condominium Ass’n v. Dept. Natural Resources, 205 Wis. 2d 710, 726 (Ct. App. 1996) (same); Reinke v. Personnel Bd., 53 Wis. 2d 123, 137-38 (1971) (applicant has the burden to prove all material facts “to a reasonable certainty, by the greater weight of the credible evidence.”); see also Wis. Ass’n of Manufacturers and Commerce v. Pub. Serv. Comm’n, 94 Wis. 2d 314, 322 (Ct. App. 1979); Daly v. Natural Resources Bd., 60 Wis. 2d 208, 219-20 (1973).

As part of this determination, the Commission must also comply with general Wisconsin rules governing its decision-making process, including Wisconsin’s Energy Priorities Law, which requires the Commission to consider if higher-priority (i.e., more sustainable) alternatives to the Proposed Project are available, cost-effective, and technically feasible. Wis. Stat. §1.12(4). The Commission must also adequately consider the environmental impacts of approving the Application, prepare an EA for the Proposed Project, and if necessary, prepare a full

ARGUMENT

I. The Proposed Project Does Not Meet Applicable Requirements for a CPCN Under Wis. Stat. §§ 196.491(3)(d)2 and 3.

The Commission may grant a CPCN for a large electric generating facility only if it determines that all of the applicable conditions in Wis. Stat. §§ 196.491(3)(d)2, and 3 are satisfied. Wis. Stat. § 196.491(3)(d). Given serious modeling flaws and late-hour changes in the circumstances of their portfolio, Joint Applicants have not met their burden to show the Proposed Project meets these requirements. Therefore, the Commission should deny the Application.

A. Joint Applicants Have Not Shown the Proposed Project Satisfies a Reasonable Need.

Wis. Stat. § 196.491(3)(d)2 requires an applicant to show a project “satisfies the reasonable needs of the public for an adequate supply of electric energy….“ Here, Joint Applicants have failed to meet that burden. Joint Applicants’ purported need for the electricity that would be generated by the Proposed Project was suspect when the Application was filed and further undermined by eleventh-hour changes to the circumstances surrounding the Application due to Joint Applicants’ announcement of their intent to purchase an existing gas-fired power generating facility. Direct-WEPCO WPSC-Gerlikowski-spr-1.

Joint Applicants’ initial modeling included biases and omissions that “render the results incapable of supporting [the Application].” Direct-CW- Hausman-pr-4:18-19. Namely, in these primary runs, Joint Applicants constrained the model by comparing their Generation Reshaping Plan (“GRP”) portfolio to an unrealistic and unduly expensive “status quo” scenario that retained

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1 Clean Wisconsin below addresses some, but not all, of the CPCN prerequisites. Clean Wisconsin is explicitly not waiving any claim that Joint Applicants have not met their burden on any of the CPCN prerequisites, whether or not addressed below.
uneconomic fossil fuel resources. Direct-CW-Hausman-pr-7. This constrained modeling by itself is insufficient to support a showing that the Proposed Project is in the public interest, but a drastic change to circumstances in December 2021 rendered Joint Applicants’ attempt to justify a need for the Purposed Project’s generation even more untenable.

Joint Applicants’ justification was significantly undermined when—only days before the hearing in this proceeding—Joint Applicants announced they would seek the Commission’s approval to purchase the LSP Whitewater electric generating facility (“Whitewater”), a 236.5 MW, dispatchable, combined-cycle gas power plant located in Whitewater, Wisconsin. Direct-WEPCO WPSC-Gerlikowski-spr-1-2. Joint Applicants have relied on Whitewater for power through a purchase power agreement (“PPA”) for approximately 25 years. Direct-WEPCO WPSC-Gerlikowski-spr-2:4-6. The imminent purchase of Whitewater dramatically altered the circumstances under which Joint Applicants originally filed the Application and purported to demonstrate a need for the Proposed Project. See Surrebuttal-CW-Hausman-pr-2:5-8. In fact, Joint Applicants initially pursued a CPCN for the Proposed Project, in part, to compensate for the anticipated termination of the PPA with Whitewater. Surrebuttal-CW-Hausman-pr-7:3-5.

As thoroughly explained in expert testimony provided on behalf of Clean Wisconsin, the ensuing Whitewater purchase will more than meet Joint Applicants’ identified capacity needs, rendering any additional generation from the Proposed Project superfluous and unreasonable under Wis. Stat. § 196.491(3)(d)3. See Surrebuttal-CW-Hausman-pr-8-15. Whitewater has nearly double the capacity of the Proposed Project, and if the Commission approves its purchase, Joint Applicants will have a dispatchable resource much larger than the Proposed Project, that is
already online and will be operating much earlier than the Proposed Project would be available.\(^2\)

**Surrebuttal-CW-Hausman-pr-14:19-20.**

To be clear, Joint Applicants provided updated data request responses attempting to integrate the Whitewater purchase into modeling runs that they claim still justify the purported capacity needs. These justifications, however, are predicated on a number of unjustified assumptions and modeling constraints. Rebuttal-CW-Hausman-pr-2:10-12. First, Joint Applicants artificially create a deficit in the model inputs that can only be filled by the Proposed Project. They do this by forcing the retirement of significant capacity in the near-term while only making replacement capacity *already owned by Joint Applicants* available before 2025, in addition to the Proposed Project. Rebuttal-CW-Hausman-spr-2:14-17. Second, Joint Applicants’ modeling assumes market capacity prices will rise to the maximum price—known as the cost of new entry (“CONE”)—in just a few years, and then remain at that level throughout the planning period they modeled. See Rebuttal-CW-Hausman-spr-2:18-20. This assumption, combined with Joint Applicants’ inexplicably short 15-year projected lifespan of Whitewater, resulted in a severely inflated projection of capacity costs in MISO. See Rebuttal-CW-Hausman-scr-9:6-18. The “unrealistically high capacity price” assumed by Joint Applicants forced the model to select for more built capacity (i.e. the Proposed Project) to avoid market purchases. Rebuttal-CW-Hausman-spr-10:11-12. In sum, Joint Applicants’ failure to model a scenario that was not unreasonably biased in favor of selecting the Proposed Project is a fatal flaw in the Application and precludes the Commission from finding that Joint Applicants have shown a reasonable need for the Proposed Project’s capacity.

\(^2\) While the purchase of Whitewater would need to be approved by the Commission, and is thus not a certainty, the intent to do so eliminates any pressure to rapidly develop a new dispatchable resource, and if nothing else, allows Joint Applicants to consider a much wider range of alternatives to meet customer capacity needs that were not considered in the Application. Surrebuttal-CW-Hausman-pr-15:3-5.
Joint Applicants’ attempt to shoehorn their purchase of Whitewater into modeling already biased towards the Proposed Project is awkward at best and deceptive at worst. The late-hour addition to Joint Applicants’ portfolio should have prompted Joint Applicants to withdraw their Application and reconsider their capacity needs in light of the change in circumstances. See Rebuttal-CW-Hausman-spr-11. Instead, Joint Applicants further warped the model with biases and assumptions that render the findings meaningless. Joint Applicants could not fairly demonstrate a capacity need for the Proposed Project before Whitewater was in play, and certainly cannot under the new circumstances.

B. Joint Applicants Have Not Shown the Proposed Project’s Design is in the Public Interest.

Wis. Stat. § 196.491(3)(d)3 requires an applicant to show a project’s design is in the public interest, considering alternative sources of supply, individual hardships, safety, reliability, and environmental factors. These conditions, particularly regarding alternative sources of supply, are not met here. Wisconsin’s Energy Priorities Law (“EPL”), Wis. Stat. § 1.12(4), discussed further below, ranks sources of supply from most to least sustainable. For Joint Applicants to show the Proposed Project is in the public interest, alternative sources of supply must be taken into consideration and the EPL establishes a hierarchy of preferred supply sources. Despite attempts to construe the modeling in their favor, Joint Applicants still fail to make this critical showing.

Joint Applicants cannot meet their burden to show the Proposed Project’s design is in public interest because the models they used failed to provide basic comparisons to other viable alternatives. The same modeling flaws discussed above and in testimony on behalf of Clean Wisconsin—retiring significant capacity in the short-term and assuming market capacity costs rise to CONE in a few years and stay there—make it impossible for Joint Applicants to meet the requirements of Wis. Stat. § 196.491(3)(d)3. See Rebuttal-CW-Hausman-spr-2-3.
Specifically, Joint Applicants have failed to show that solar generation combined with a battery energy storage system (“BESS”) is not a viable alternative to the Proposed Project. Joint Applicants’ testimony on this issue was oversimplified to a fault. In an explanation predicated on the rote idea that “[a] solar resource can only produce energy when the sun is shining,” Joint Applicants assert that it would take, depending on the time of year, between 5.9 and 10 MW of solar and BESS capacity to replace 1 MW of generation at the Proposed Facility. Direct-WEPCO WPSC-Arendt-pr-12. But Joint Applicants’ testimony on this matter “ignores the operational reality” of the Proposed Project. Direct-CW-Hausman-pr-29:15. The flat load and expected output assumptions in Joint Applicants’ discussion of solar and BESS are nothing more than “an illustrative example that is so far from expected operational reality” that “[t]he economics of the proposed resources cannot be evaluated….” Direct-CW-Hausman-pr-29:19-12. In fact, other testimony from Joint Applicants undermines their own comparison of the Proposed Project with solar and BESS, noting that “[t]hroughout the year, the [Proposed Project would] operate at a 21% capacity factor….” Direct-WEPCO WPSC-Hagerty-pr-13:3.

Joint Applicants purport to justify a need for the Proposed Project, in part, by providing dispatchable generation to supplement increasing renewable resource generation. See Direct-WEPCO WPSC-Hagerty-pr-12-14. But Joint Applicants do not operate in isolation and need not “rely entirely on their own flexible generation and storage to accommodate their solar production profile.” Direct-CW-Hausman-pr-27:5-6. In fact, “the role played by the [Proposed Project] would be very small under Joint Applicants’ proposed configuration.” Direct-CW-Hausman-pr-26:19-20; see also Direct-CW-Hausman-cr-27: Figures 3 and 4. Realistic capacity factors and grid operations, “not some mode that is irrelevant to the current case”, should be evaluated when considering the viability of alternative sources of supply. Direct-CW-Hausman-pr-30:2-3.
Finally, any claims related to the possible future use of “renewable” natural gas or hydrogen as a fuel source at the Proposed Project must not be given any merit. See Direct-WEPCO WPSC- Eidukas-r-8:8-11. These alternative fuels are not part of Joint Applicants’ plan, and critical details such as the source of these hypothetical fuels, their financial costs, or GHG costs and benefits, are not provided. Direct-CW-Hausman-pr-30. Joint Applicants’ compliance with Wis. Stat. § 196.491(3)(d)3 must be judged based on the record before the Commission and claims about future fuel switching are not supported in it.

Joint Applicants have not met their burden to show the Proposed Project meets the requirements Wis. Stat. § 196.491(3)(d)2 or 3. Their modeling used to demonstrate a lack of alternatives and a supposed need for the Proposed Project’s capacity was marred from the start and became almost entirely irrelevant after Joint Applicants decided to purchase Whitewater. The Commission should deny the Application.

II. The Proposed Project Does Not Meet Requirements of Wisconsin’s Energy Priorities Law.

In considering the Application, the Commission must comply with Wisconsin’s Energy Priority Law (“EPL”), which establishes as “the policy of the state” that:

“[T]o the extent cost-effective and technically feasible, options [to meet energy demands must] 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.”

Wis. Stat. § 1.12(4).

The EPL requires state actors to “design all new and replacement energy projects following the[se] priorities.” Wis. Stat. § 1.12(5)(b). And, the Commission is specifically tasked with implementing this priority list: “to the extent cost-effective, technically feasible and
environmentally sound, the [C]ommission shall implement the priorities under [the EPL] in making all energy-related decisions and orders…. Wis. Stat. §196.025(1)(ar).

The Wisconsin Supreme Court, in a comprehensive discussion of the EPL, ruled that “[w]hen the [Commission] makes a determination on a CPCN under the Plant Siting Law, it applies the EPL in the context of determining whether to approve the requested plant siting.” Clean Wisconsin, Inc. v. Pub. Serv. Comm'n of Wisconsin, 282 Wis. 2d 250, 344 (Wis. 2005). In such a situation, “[t]he question the [Commission] should ask is thus: Given the requirements of the Plant Siting Law, what is the highest priority energy option that is also cost effective and technically feasible?” Id. Although the Court upheld the Commission’s determination in that case, it confirmed that the EPL analysis is “binding,” and that the Commission cannot approve a CPCN for a facility that is not the highest-priority project alternative that is both cost-effective and technically feasible. Id. at 347-48 (noting that the Commission properly “consider[ed] the EPL to be binding”).

The Proposed Project does not meet these requirements, and Joint Applicants cannot support their case for approving the Application under the EPL. Joint Applicants have “failed to identify or evaluate most higher-ranked alternatives, and necessarily failed to then demonstrate that they are not cost-effective, technically feasible, or environmentally sound.” Direct-CW-Hausman-pr-6:8-20. As discussed above, Joint Applicants’ modeling in this proceeding was inadequate because it fails to provide a basic comparison of viable alternatives for any needed capacity. See Direct-CW-Hausman-pr-17-25. Again, these modeling failures include but are not limited to unreasonable carbon offset prices, and the faulty assumption that market capacity prices will rise to CONE in a few years and remain there. Direct-CW-Hausman-pr-16; Rebuttal-CW- Hausman-spr-2; see also Surrebuttal-CW-Hausman-pr-17. The modeling deficiencies
prevent Joint Applicants, other parties, or the Commission from knowing “what resources would be selected absent the purported constraints.” Direct-CW-Hausman-pr-33:18.

In sum, Joint Applicants have not presented information sufficient for the Commission to conclude that the Proposed Project is needed to provide capacity that could not also have been provided by a higher-priority resource under the EPL. Joint Applicants “should have considered a broad range of options that would allow them to avoid (or at least defer) investment in additional fossil-fired resources, and not commit to decades of additional carbon emissions at a time when their own commitments, the State of Wisconsin, the United States, and the global community are trying to avert a climate catastrophe.” Direct-CW-Hausman-pr-35:15-19.

III. The Proposed Project is Inconsistent with Climate Commitments of the State of Wisconsin, the Federal Government, and WEC.

Clean Wisconsin’s primary concern with the Proposed Project is its contribution to climate change through greenhouse gas (“GHG”) emissions. While Wisconsin law precludes the Commission from considering air pollution impacts in a CPCN proceeding (because the Department of Natural Resources regulates air pollution), the Commission is charged with prioritizing energy resources from most sustainable (i.e., least GHG emissions) to least sustainable.

The State of Wisconsin and the Federal Government have also established GHG emission reduction commitments to stave off the worst effects of climate change. Governor Evers issued Executive Order #38 which commits Wisconsin to “achieve a goal of ensuring all electricity consumed within the State of Wisconsin is 100 percent carbon-free by 2050.” Ex.-CW Mathewson-11. Wisconsin’s commitment is designed to be consistent with the 2015 Paris Climate Accord, to which the United States and Wisconsin—as a member of the United States
Climate Alliance—are signatories. Direct-CW-Hausman-pr-8. Meeting these targets “will require substantial economy-wide carbon reductions by 2030.” Direct-CW-Hausman-pr-8:11-12.

Joint Applicants’ parent company, WEC, has also committed to achieving CO₂ emission reduction targets to address climate change. The Application states that “WEC has established CO₂ emission reduction goals as part of its overall environmental strategy with a 55% reduction in CO₂ emissions as compared to 2005 emission levels by 2025 and 70% reduction in CO₂ emissions by 2030.” Ex.-WEPCO WPSC-Application: Sec. 2.4. WEC’s actual commitments are stronger yet: a 60% reduction in CO₂ emissions by 2025, an 80% reduction by 2030, and a fleet-wide net-zero target by 2050. Ex.-CW-Hausman-02r:ii.

The Proposed Project flies in the face of these commitments. It would be a serious contributor of GHG emissions and a significant blow against Wisconsin’s efforts to mitigate climate change. Despite getting credit for the concurrent retirement of other fossil-fueled generation at the Weston site, the Proposed Project would still contribute a net increase of 491,000 tons of CO₂e annually. Ex.-PSC-EA:19; Table 4. This net increase amounts to an approximate 0.5% increase in total annual emissions from Wisconsin’s energy sector. Direct-CW-Mathewson-15.

Joint Applicants’ GRP, including the Proposed Project, “fails to meet even the previous, less stringent emissions goal for 2030.” Direct-CW-Hausman-pr-12:2-3. Joint Applicant WEPCO would emit [redacted] of CO₂ in 2030, or [redacted] more than the 70% reduction described in the Application, and WPS would emit [redacted] of CO₂ in 2030, or [redacted] more than a 70% reduction would allow. Direct-CW-Hausman-cr-12:3-6. Based on Joint Applicants' more recent 80% reduction commitment, projected emissions under the GRP would put Joint
Joint Applicants contend that the current GRP is just a “first step” that will position them to comply with even WEC’s more ambitious CO₂ commitments. Rebuttal-WEPCO WPSC-Arendt-pr-5:12-13; see also Rebuttal-WEPCO WPSC-Gerlikowski-cr-10. But these assertions are not supported by the record. Instead, Joint Applicants’ “own modeling studies suggest that they have no plan to meet their own commitments, except to assume they will be able to pay an unrealistically low and unsupported price for ‘offsets’ to paper over their failure.” Surrebuttal-CW-Hausman-pr-16:8-10. Ultimately, Joint Applicants have “modeled a resource plan that falls far short of [their] own emissions commitments, and [expect] the Commission to take on faith that they will change their ways in some unspecified manner, at some unspecified future date, and at an unknown cost.” Surrebuttal-CW-Hausman-pr-16:12-15.

Fortunately, as discussed above, the Commission has the authority to take the Proposed Project’s climate impacts into account when considering the Application. First, Wis. Stat. §§ 196.491(3)(d)2 and 3 require Joint Applicants to show the Proposed Project satisfies a reasonable need for the power it would generate and that there are not alternative sources of supply available to meet a justified need. Second, Wisconsin’s Energy Priorities Law requires the Commission to prioritize sustainable (e.g. renewable) energy resources when considering the Application. As discussed above, the Proposed Project falls far short of meeting each of these requirements.

IV. The Environmental Assessment Prepared for the Project Does Not Satisfy the Wisconsin Environmental Policy Act, Wis. Stat. § 1.11.

The Environmental Assessment (“EA”) for the Proposed Project is not sufficient to allow the Commission to make a reasoned preliminary judgment about the Proposed Project’s environmental impacts and does not meet the requirements of applicable Commission
For a Type II Commission action, such as consideration of a CPCN for the Proposed Project, the Commission must prepare an EA that “provides a factual investigation of the relevant areas of environmental concern in sufficient depth to permit a reasonably informed preliminary judgment of the environmental consequences of the proposed action.” Wis. Admin. Code ch. PSC 4.20. The EA for the Proposed Project fails to meet this standard in several ways, two of which will be discussed in detail below.

First, the EA is inadequate because it fails to reasonably consider impacts of GHG emissions. Instead of providing any discussion of actual environmental impacts of the Proposed Project’s GHG emissions in Wisconsin or elsewhere, the EA merely references an EIS for an entirely different project from 2008 and a “scan of news sources…..” Ex.-PSC-EA: 24. It then states the obvious saying potential climate impacts of GHG emissions are worse than they were 13 years ago. Ex.-PSC-EA: 24. It is entirely unclear how the Commission can make a “reasonable informed preliminary judgement” based on this outdated and superficial information. Furthermore, though the EA includes at least one sentence acknowledging the disproportionate impacts of climate change on disadvantaged communities in the GHG section, considerations related to climate change are entirely absent from the EA’s analysis of impacts related to environmental justice and sensitive receptors. Ex.-PSC-EA: 29-31.

The EA’s dearth of information on climate change is inexcusable because the information is readily available. In fact, in this proceeding, Dr. Paul Mathewson provided specific details about climate change’s impacts globally and in Wisconsin, including but not limited to impacts

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3 Clean Wisconsin commented on the EA in the course of this proceeding, raising the issues discussed herein and others. Ex.-PSC-Public Comment: Clean Wisconsin (PSC REF. #421905). Clean Wisconsin is explicitly not waiving any claim regarding the sufficiency of the EA, whether or not addressed herein.
warming will have on infrastructure, Great Lakes coastal communities, and agriculture, as well as public health. Direct-CW-Mathewson-11-14.

Second, the EA’s analyses of air pollutants, specifically particulate matter (“PM”) and nitrogen dioxide (“NO₂”), are similarly insufficient to satisfy the requirements of Wis. Admin. Code ch. PSC 4.20. The Proposed Project “is predicted to significantly increase concentrations” of these pollutants, both of which can impact cardiovascular and respiratory health, leading to a negative impact on local health. Direct-CW-Matehwson-6:6-9. Even though levels of PM, for example, are expected to remain under the National Ambient Air Quality Standards threshold, it is “not certain” that this standard is “adequately protective of public health.” Direct-CW-Mathewson-6:10-13. The EA’s insufficient discussion of air pollution impacts is especially harmful given the Department of Natural Resource’s reliance on the EA when considering air permits. Ex.-PSC-EA Notification Letter: 3 (PSC REF# 413390).

The EA’s severely limited analysis of the Proposed Project’s environmental impacts, particularly related to climate change and air pollutants, is insufficient to allow the Commission to make a reasoned preliminary judgment regarding those impacts and does not fulfil the Commission’s obligations under Wis. Admin. Code ch. PSC 4.20.

V. Conclusion

Joint Applicants have proposed a fossil-fueled generation plant that addresses no established capacity need and is not in the public interest. Joint Applicants did not meet their burden to show that the conditions for CPCN approval are met. Higher-priority sources are technically feasible, cost-effective, and would support rather than stonewall the GHG emission reduction targets of Wisconsin, the Federal Government, and even Joint Applicants’ parent company. For the reasons stated above, Clean Wisconsin respectfully requests the Commission
deny Joint Applicants’ Application for a CPCN for the Weston RICE plant. The Commission should also find that the EA is insufficient to support the Proposed Project.

Dated this 9th day of February 2022.

Respectfully Submitted,

/s/ Brett Korte
Brett Korte
Staff Attorney, Clean Wisconsin
634 W. Main Street, Suite 300
Ph. (608) 251-7020 x 27
bkorte@cleanwisconsin.org