

FINAL Decision Matrix  
 Wisconsin Electric Power Company, Wisconsin Public Service Corporation, and Madison Gas and Electric Company  
 Docket 5-BS-254  
 March 4, 2022

Public Service Commission of Wisconsin  
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**Issue 1: Will the proposed acquisitions meet the requirements for issuance of a Certificate of Authority (CA) under Wis. Stat. § 196.49(3)(b) and Wis. Admin. Code ch. PSC 112?**

**Issue Scope:** Wisconsin Electric Power Company (WEPCO), Wisconsin Public Service Corporation (WPSC), and Madison Gas and Electric Company (MGE) (together, applicants) propose to acquire and construct a 200 megawatt (MW) solar-powered electric generating station that includes 110 MW of battery energy storage system (BESS) developed and proposed by Invenergy LLC in docket 9801-CE-100 near the town of Paris in southeastern Wisconsin. Ownership of the proposed acquisition will be split amongst the applicants as follows:

- WEPCO: 150 MW Solar; 82.5 MW BESS (75 percent of the total)
- WPSC: 30 MW Solar; 16.5 MW BESS (15 percent of the total)
- MGE: 20 MW Solar; 11 MW BESS (10 percent of the total)

The acquisition is part of a larger generation reshaping plan (GRP) portfolio assembled by WEPCO and WPSC. The estimated total cost of the proposed acquisition is \$433 million, not including allowance for funds used during construction (AFUDC). Pursuant to Wis. Stat. § 196.49(3)(b), the Commission may refuse to certify a project if it appears that the completion of the acquisition will do any of the following:

1. Substantially impair the efficiency of the service of the public utility;
2. Provide facilities unreasonably in excess of the probable future requirements;
3. When placed in operation, add to the cost of service without proportionately increasing the value or available quantity of service unless the public utility waives consideration by the Commission, in the fixation of rates, of such consequent increase in the cost of service.

PARTY POSITIONS	AMOUNT	TRANSCRIPT REFERENCES
<p><b>Joint Applicants:</b> Support Alternative One. WEPCO/WPSC’s need is uncontested given their plan to retire/replace approximately 1,600 MW of fossil generation by 2024. The project is an affordable, reliable, and clean replacement for that capacity, cost-effective compared to traditional resources, and PLEXOS selected it over alternatives, confirming it’s a least-cost solution for customers. The project is part of the least cost plan for meeting the capacity and energy needs of MGE’s customers, a conclusion Commission staff confirmed.</p>		Direct-WEPCO WPSC-Eidukas-3-8; Direct-WEPCO WPSC-Gerlikowski-3-15, 27-32, 39-40; Rebuttal-WEPCO WPSC-Gerlikowski-6-8, 15-20; Direct-PSC-Adams-3-5; Ex.-WEPCO WPSC MGE- Application-Application-2; Ex.-WEPCO WPSC MGE-Application: Appendix C; Direct-MGE-Block-2; Direct-PSC-

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		Grant-pr-20-22; Direct-PSC-Hamill-p-9
<b>CUB:</b> Supports Alternatives Two (a) and Two (b). The record does not demonstrate that the Paris project meets the legal requirements for issuance of a CA.		Direct-CUB-Singletary-r-2-18; Surrebuttal-CUB-Singletary-3; Direct-WEPCO WSPC-Gerlikowski-pr-12; Direct-CUB-Kihm-2-21; Surrebuttal-CUB-Singletary-8-9
<b>RENEW:</b> Supports Alternative One (a) and (b). The proposed solar and storage project represents a prudent investment in a clean generation portfolio.		Direct-RENEW-Vickerman-6-7, 8-9
<b>Commission Staff:</b> Commission staff reviewed the applicants' PLEXOS and EGEAS modeling and confirmed that the proposed acquisition was selected over a wide range of generation expansion scenarios.  WEPCO and WSPC submitted financial spreadsheet analysis to support its selection of the proposed acquisition. Commission staff reviewed the information made available by WEPCO and WSPC, plus its own research, to evaluate the cost-effectiveness of the acquisition. Commission staff's economic analysis supported the cost-effectiveness of the 200 MW solar-electric generating facility. Due to the novelty of battery storage technology for utility-scale applications, and based on the application materials, data request responses, and testimony received into the record in this proceeding, Commission staff's financial evaluation was unable to verify the applicants support for the cost-effectiveness of acquiring 110 MW of BESS in this docket.		Direct-PSC-Grant-cr-6-22; Direct-PSC-Grant-pr-6-22; Direct-PSC-Hamill-c-3-9; Direct-PSC-Hamill-p-3-9; Ex.-PSC-Hamill-1c; Ex.-PSC-Hamill-1p  Direct-PSC-Adams-r-3-7; Ex.-PSC-Adams-1; Ex.-PSC-Adams-2; Direct-PSC-Bacalao-r-4-18; Ex.-PSC-Bacalao-1; Ex.-PSC-Bacalao-2; Ex.-PSC-Bacalao-3; Ex.-PSC-Bacalao-4; Surrebuttal-PSC-Bacalao-r-1-9; Direct-PSC-Adams-r-4-6; Direct-PSC-Bacalao-r-8-17; Surrebuttal-PSC-Bacalao-r-5, 8-9
<b>COMMISSION ALTERNATIVES</b>		
<b>Alternative One (a):</b> For WEPCO and WSPC, the proposed acquisition meets the requirements for issuance of a CA under Wis. Stat. § 196.49(3)(b) and Wis. Admin. Code ch. PSC 112.	<b>Alternative One (b):</b> For MGE, the proposed acquisition meets the requirements for issuance of a CA under Wis. Stat. § 196.49(3)(b) and Wis. Admin. Code ch. PSC 112.	

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<b>Alternative Two (a):</b> For WEPCO and WPSC, the proposed acquisitions do not meet the requirements for issuance of a CA under Wis. Stat. § 196.49(3)(b) and Wis. Admin. Code ch. PSC 112.	<b>Alternative Two (b):</b> For MGE, the proposed acquisitions do not meet the requirements for issuance of a CA under Wis. Stat. § 196.49(3)(b) and Wis. Admin. Code ch. PSC 112.
<b>Commissioner Notes:</b>	

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<b>Issue 2: Are any higher-priority Energy Priority Law (EPL) options cost-effective, technically feasible, and environmentally sound alternatives to building the proposed project, per Wis. Stat. §§ 1.12 (4) and 196.025(1)?</b> <b>1. Energy conservation and efficiency;</b> <b>2. Noncombustible renewable energy resources;</b> <b>3. Combustible renewable energy resources;</b> <b>4. Advanced nuclear energy;</b> <b>5. Nonrenewable combustible energy resources.</b>		
<b>Issue Scope:</b> The applicants state they have satisfied all the requirements of Wis. Stat. § 196.374(8). Therefore, the Commission may not require energy efficiency or conservation in connection with its approval of the acquisition of the Paris facility. The solar and BESS facility is a noncombustible renewable resources, which is the second-highest energy priority.		
<b>PARTY POSITIONS</b>	<b>AMOUNT</b>	<b>TRANSCRIPT REFERENCES</b>
<b>Joint Applicants:</b> Support Alternative One (a) and (b). No party appears to contest that the proposed solar and battery energy storage system (BESS) technology meets this requirement. To quote RENEW, “Paris is wholly consistent with Wisconsin’s Energy Priorities Law, and, notably, at the scale needed to achieve deep carbon reductions.”		Direct-RENEW-Vickerman-8-9; Ex.-WEPSCO WPSC MGE-Application-Application-19-21
<b>CUB:</b> Takes no position. The record does not demonstrate that WEPSCO and WPSC considered alternatives to the proposed project. Given the absence of evidence comparing the project to alternatives, it might be presumed that higher-priority alternatives exist.		Direct-CUB-Singletary-r-3; Direct-WIEG-Maini-p-4
<b>RENEW:</b> Supports Alternative One (a) and (b).		Direct-RENEW-Vickerman-9
<b>Commission Staff:</b> Takes no position.		
<b>COMMISSION ALTERNATIVES</b>		
<b>Alternative One (a):</b> For WEPSCO and WPSC, no EPL alternatives exist that are cost-effective, technically feasible, and environmental sound alternatives to the proposed project.	<b>Alternative One (b):</b> For MGE, no EPL alternatives exist that are cost-effective, technically feasible, and environmental sound alternatives to the proposed project.	
<b>Alternative Two (a):</b> For WEPSCO and WPSC, one or more EPL alternatives exist that are cost-effective, technically feasible, and environmental sound alternatives to the proposed project.	<b>Alternative Two (b):</b> For MGE, one or more EPL alternatives exist that are cost-effective, technically feasible, and environmental sound alternatives to the proposed project.	
<b>Commissioner Notes:</b>		

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<b>Issue 3: Does the proposed acquisition comply with Wis. Stat. § 196.49(4), the brownfields statute for CAs? (Uncontested)</b>		
<b>Issue Scope:</b> Under Wis. Stat. § 196.49(4), the Commission may not issue a certificate “for the construction of electric generating equipment and associated facilities unless the commission determines that brownfields . . . are used to the extent practicable.” As defined in Wis. Stat. § 238.13(1)(a), a brownfield means “abandoned, idle, or underused industrial or commercial facilities or sites, the expansion or redevelopment of which is adversely affected by actual or perceived environmental contamination.”		
<b>PARTY POSITIONS</b>	<b>AMOUNT</b>	<b>TRANSCRIPT REFERENCES</b>
<b>Joint Applicants:</b> Support the uncontested alternative.		Direct-PSC-Schumacher-1-3
<b>CUB:</b> Takes no position.		
<b>RENEW:</b> Supports the Uncontested Alternative.		Direct-PSC-Schumacher-1-3
<b>Commission Staff:</b> The Environmental Assessment (EA) conducted in the corresponding Certificate of Public Convenience and Necessity (CPCN) docket (9801-CE-100) described Invenergy LLC’s evaluation of brownfield sites for the solar electric generation facilities. The Commission found in that docket that the project complied with Wis. Stat. 196.491(3)(d)8., the brownfields statute for CPCNs.		Direct-PSC-Schumacher-1-3
<b>COMMISSION ALTERNATIVES</b>		
<b>Uncontested Alternative:</b> The proposed acquisition complies with Wis. Stat. § 196.49(4), to the extent applicable and practicable.		
<b>Commissioner Notes:</b>		

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**Issue 4: What standard order conditions, if any, should be attached to the proposed acquisition to meet the requirements of Commission approval?**

**Issue Scope:** In the application, the applicants agreed to be bound by the provisions of the Commission's Final Decision in docket 9801-CE-100 and limitations on the developers' authority, and to the following reporting conditions from docket 5-BS-228:

- a. After completion of the proposed acquisition, applicants shall submit to the Commission their respective proposed accounting entries to record the acquisition of the facilities.
- b. The applicants shall provide copies of agreements between the applicants and the developers as they become available for informational purposes.
- c. The applicants shall inform the Commission of the effective date of the purchase of the project within 30 days of the effective date of the transfer.
- d. If applicants do not proceed to closing or enter into any arrangement with another party regarding ownership or operation of the projected project, applicants shall provide prior notice to the Commission.
- e. To the extent the applicants proceed to closing prior to completion of construction of the projects, the applicants shall file with the Commission quarterly process reports that include the following: the date that construction commences, major construction and environmental milestones, including permits obtained, by agency, subject, and date, summaries of the status of construction, the anticipated in-service date, and the overall percent of physical completion, actual project costs to-date, once a year, a revised total cost estimate for the project, the date that the projects are placed in service and the final, as-built cost of the project. (Final Decisions, dockets 5-BS-228, 5-BS-234, and 6680-CE-182.)
- f. Applicants shall be bound by all commitments made by developer in their applications, subsequent filings, and the provisions of the Commission's Final Decisions in docket 9801-CE-100. The assignment of the CPCN for the project does not confer additional rights to the applicants than what was afforded to the developer at the time of the application and as specified in the Final Decisions in docket 9801-CE-100. Notwithstanding Wis. Stat. §§ 32.02 and 32.03(5)(a), such transfer shall not confer any right to use eminent domain.
- g. All commitments made by the applicants in their application, subsequent filings, and the provisions of the Final Decision shall apply to the applicants, any agents, contractors, successors, assigns, corporate affiliates and any future owners or operators of the project. To the extent the applicants transfer any ownership or operational interest in the project, in whole or in part, to a third-party, such transfer does not confer either additional rights or obligations upon that third-party than what is afforded to the original developers of the project specified in the Final Decisions in dockets 9801-CE-100. If the successor, assign, or future owner or operator of the project is a public utility and notwithstanding Wis. Stat. §§ 32.02 and 32.03(5)(a), such transfer shall not confer any right to use eminent domain.

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The above conditions, as well certain other conditions discussed in Issue 5, have been routinely imposed as a condition of approval in prior similar dockets. *See, e.g.*, 5-BS-228, 5-BS-234, 6680-CE-182. In addition to the above, the following conditions are also standard.

- h. The applicants may not proceed with any substantial changes in scope, design, size, or location of the approved projects except as provided for in the Final Decision in docket 9801-CE-100. (Final Decisions, dockets 5-BS-228, 5-BS-234, and 6680-CE-182.)
- i. Jurisdiction is retained.

<b>PARTY POSITIONS</b>	<b>AMOUNT</b>	<b>TRANSCRIPT REFERENCES</b>
<b>Joint Applicants:</b> Do not object to Alternative One, which is limited to routinely imposed conditions of approval.		Ex.-WEPCO WPS MGE-Application-Application-12
<b>CUB:</b> Takes no position.		
<b>RENEW:</b> Takes no position.		
<b>Commission Staff:</b> Supports a range of conditions for the Commission’s consideration in this docket.		
<b>COMMISSION ALTERNATIVES</b>		
<b>Alternative One:</b> Any or all of the conditions listed as 4a. through 4i. are necessary for approval of the proposed acquisition, as the Commission deems appropriate.		
<b>Alternative Two:</b> None of the conditions listed as 4a. through 4i. are necessary for approval of the proposed acquisition.		
<b>Commissioner Notes:</b>		

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**Issue 5: What cost-related order conditions, if any, should be attached to the proposed acquisition to meet the requirements of Commission approval?**

**Issue Scope:** In this application, the joint applicants propose to acquire and construct Paris at a total cost of \$433 million (excluding AFUDC). The cost estimate for this project is comprised of several components, including the capital cost of the solar facilities and of the BESS system, transmission interconnection costs, and owners' costs. The acquisition is subject to two agreements: an asset purchase agreement (APA) and an engineering, procurement and construction agreement (EPC). The APA establishes a fixed price for a subset of the project's costs. The EPC is not a fixed price contract. It does set a price for a defined scope of work, but changes in that scope due to conditions that cannot be known until construction starts may result in changes to the EPC contract price. The applicants contend that some consideration must be given to the handling of cost deviations.

In prior dockets that involved acquisitions and construction arrangements, the Commission has imposed the following conditions as relates to notification and recoverability of costs. In docket 5-BS-228, the Commission imposed the following order conditions:

6. *Within 60 days of the effective date of the transfer, applicants shall file with the Commission the final closing purchase price, which is not to exceed \$389.7 million (excluding AFUDC).*
7. *The Commission, consistent with its past practice, shall review in a future rate case the recoverability of costs associated with the acquisition, operation and maintenance costs, and revenues associated with the projects; provided however, that in no event shall the recoverability of the acquisition costs exceed \$389,700,000 (excluding AFUDC), and provided however applicants may include costs associated with AFUDC because the applicants may take ownership of the Solar Facilities prior to construction, and provided that the calculation of AFUDC shall not be based on a cost greater than \$389,700,000.*

In docket 5-BS-234, the Commission imposed the following order condition:

4. *The applicants shall inform the Commission of the effective date of the purchase of the projects within 30 days of the effective date of the transfer. If the applicants do not proceed to closing or enter into any arrangement with another party regarding ownership or operation of the projected projects, they shall provide prior notice to the Commission. Further, within 60 days of the effective date of the transfer, the applicants shall file with the Commission the final closing purchase price, which is not to exceed \$194.9 million plus AFUDC.*



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5. *The Commission, consistent with its past practice, shall review in a future rate case the recoverability of costs associated with the acquisition, O&M costs, and revenues associated with the projects; provided, however, that in no event shall the recoverability of the acquisition costs exceed \$194.9 million plus AFUDC, and provided, however, that the applicants may include costs associated with AFUDC because the applicants may take ownership of the project prior to construction, and provided that the calculation of AFUDC shall not be based on a cost greater than \$194.9 million. The applicants may not earn a current return on CWIP for any costs associated with Badger Hollow II. Notwithstanding the foregoing, the applicants may request in a future rate case recovery of acquisition costs in excess of \$194.9 million plus AFUDC in the event that acquisition costs increase as a result of force majeure event (provided, however, that the applicants have provided notice to the Commission within 30 days learning of any such force majeure event(s).) Costs attributable to force majeure events may increase the cost basis for calculation of AFUDC at the Commission’s discretion. This exception does not bind the Commission to any specific treatment or recoverability of acquisition costs in any future rate case proceeding.*

The following cost-related order conditions were introduced by the applicants, Commission staff, or intervenor parties in the record for this docket, in the event that the Commission determines to grant a CA:

- a. Either one or none of the following three conditions as relates to reporting of cost overruns:
  - 1. If it is discovered that the total project cost, including force majeure costs, may exceed the current estimate (\$433 million), the applicants shall promptly notify the Commission as soon as they become aware of the possible change or cost increase. (Rebuttal-CUB-Singletary.)
  - 2. If it is discovered or identified that the project cost, including force majeure costs, may exceed the estimated cost by more than 10 percent, the applicants shall notify the Commission within 30 days of when they become aware of the possible change or cost increase. (Surrebuttal-WEPCO/WPSC-Eidukas.)
- b. The applicants shall seek Commission approval prior to the recovery of any costs in excess of \$433 million, excluding AFUDC, which represents the total project costs estimated by the applicants. (Rebuttal-CUB-Singletary.)
- c. The applicants shall record 100 percent AFUDC on CWIP at their respective weighted average costs of capital. (Direct-PSC-Schuster.)

PARTY POSITIONS	AMOUNT	TRANSCRIPT REFERENCES
<b>Joint Applicants:</b> Support Alternative Two. Joint Applicants do not object to proposed conditions a.2 or c. But they oppose proposed condition a.1 and b, which reflects a mistaken assumption that the utilities’		Surrebuttal-WEPCO WPSC-Eidukas; Ex.-WEPCO WPSC MGE-Application-Application-11

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price is entirely fixed. It is not. If a 10 percent threshold is reasonable in a construction docket, it is equally reasonable here, where unanticipated cost increases for construction, materials, taxes, or other items can likewise be passed along to Joint Applicants under the EPC Agreement.		
<b>CUB:</b> Supports Alternative One. Specifically, CUB believes Condition a.1. and Condition b. are necessary for approval of the proposed acquisition.		Rebuttal-CUB-Singletary
<b>RENEW:</b> Takes no position.		
<b>Commission Staff:</b> The Commission has imposed a range of conditions in prior dockets.		Dockets 5-BS-228, 5-BS-234
<b>COMMISSION ALTERNATIVES</b>		
<b>Alternative One:</b> Any or all of the conditions listed in Issue 5 are necessary for approval of the proposed acquisition, as the Commission deems appropriate.		
<b>Alternative Two:</b> Any or all of the conditions listed in Issue 5 as modified by the Commission are necessary for approval of the proposed acquisition.		
<b>Alternative Three:</b> None of the conditions listed in Issue 5 are necessary for approval of the proposed acquisition.		
<b>Commissioner Notes:</b>		

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<b>Issue 6: What ratepayer-protection conditions, if any, should be attached to the proposed acquisition to meet the requirements of Commission approval?</b>		
<p><b>Issue Scope:</b> The following conditions were proposed in the record for the Commission’s consideration in this docket, in the event that the Commission determines to grant a CA:</p> <p>a. The applicants shall incorporate into the agreement ratepayer protections that mitigate financial risk for technological obsolescence in a fashion similar to a PPA. (Direct-PSC-Bacalao, Surrebuttal-PSC-Bacalao, Direct-WIEG-Maini-r, Surrebuttal-WIEG-Maini.)</p>		
PARTY POSITIONS	AMOUNT	TRANSCRIPT REFERENCES
<p><b>Joint Applicants:</b> Support Alternative Two. Neither WIEG nor Commission staff have proposed realistic, specific conditions to address the perceived risk of technological obsolescence, which is not unique to BESS technology in any event, and the commercial terms already agreed to with Invenergy adequately address any such risk. Moreover, there is no indication Invenergy would agree to restructure the acquisition as a PPA—or, if so, at what additional cost to customers.</p>		<p>Rebuttal-WEPCO WPSC-O’Conor; Rebuttal-WEPCO WPSC-Hagerty-18-20; Surrebuttal-WEPCO WPSC-Hagerty-2-3; Sur-surrebuttal-WEPCO WPSC-Gerlikowski-5; Ex.-WEPCO WPSC-Gerlikowski-13</p>
<p><b>WIEG:</b> Supports Alternative Three or Four. Approval should be contingent on the applicants executing a PPA with Invenergy or, alternatively, order points that provide ratepayers protections equivalent to those of a PPA. The PPA or equivalent order points insulate ratepayers from cost and technological uncertainties accompanying the untested BESS, including operating performance that is less than the applicants’ claim and premature technological obsolescence.</p> <p>(Note: Witnesses Maini and Bacalao did not testify to a risk of “technological obsolescence” but, instead, “<i>premature</i> technological obsolescence”. WIEG supports revising Issue 6 to include “premature” with “technological obsolescence” in each instance the term now appears).</p>		<p>Direct-WIEG-Maini-cr-15-19; Surrebuttal-WIEG-Maini-c-8-11; Direct-PSC-Bacalao-r-12-18; Ex.-PSC-Bacalao-3; Surrebuttal-PSC-Bacalao-r-5-9</p>
<p><b>CUB:</b> Supports Alternative One. In the event that the Commission determines that other requirements for CA approval have been met, additional ratepayer protections that mitigate financial risk for technological obsolescence should be attached to the proposed acquisition to meet requirements for approval.</p>		<p>Surrebuttal-CUB-Singletary-6; Rebuttal-CUB-Kihm-r-1-6; Direct-WIEG-Maini-p-16-18; Rebuttal-CUB-Kihm-r-3, 6; Direct-PSC-Adams 5-6</p>

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<b>RENEW:</b> Takes no position.		
<b>Commission Staff:</b> Supports the incorporation of additional ratepayer protections for technological obsolescence.		Direct-PSC-Bacalao-r-12-18; Ex.-PSC-Bacalao-3; Surrebuttal-PSC-Bacalao-r-5-9
<b>COMMISSION ALTERNATIVES</b>		
<b>Alternative One:</b> It is reasonable to impose one or more conditions for ratepayer protection to mitigate risk for technological obsolescence, consistent with the Commission’s discussion.		
<b>Alternative Two:</b> It is not reasonable to impose conditions for ratepayer protection to mitigate risk for technological obsolescence.		
<b>Commissioner Notes:</b>		

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<b>Issue 7: Has the Commission complied with the Wisconsin Environmental Policy Act (WEPA) pursuant to Wis. Stat. § 1.11 and Wis. Admin. Code ch. PSC 4? (Uncontested)</b>		
<b>Issue Scope:</b> The Commission must review the potential environmental impacts of the proposed acquisition before issuing a CA. An EA for this solar-powered electric generating and BESS facility were reviewed and a CPCN was issued in docket 9801-CE-100.		
<b>PARTY POSITIONS</b>	<b>AMOUNT</b>	<b>TRANSCRIPT REFERENCES</b>
<b>Joint Applicants:</b> Support the Uncontested Alternative.		Direct-PSC-Schumacher-1-3
<b>CUB:</b> Takes no position.		
<b>RENEW:</b> Supports the Uncontested Alternative.		Direct-PSC-Schumacher-1-3
<b>Commission Staff:</b> Yes.		Direct-PSC-Schumacher-1-3
<b>COMMISSION ALTERNATIVES</b>		
<b>Uncontested Alternative:</b> The Commission complied with WEPA pursuant to Wis. Stat. § 1.11 and Wis. Admin. Code ch. PSC 4.		
<b>Commissioner Notes:</b>		

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<b>Issue 8: Should the Commission grant a CA for the proposed acquisition?</b>		
<b>Issue Scope:</b> The Commission may approve an application for a CA if it determines that the proposed acquisition meets all the criteria listed in Wis. Stat. § 196.49 and Wis. Admin. Code ch. PSC 112. If the Commission grants a CA for the proposed acquisitions, the Commission may impose terms, conditions, or requirements pursuant to Wis. Stat. §§ 196.02, 196.395, and 196.49.		
<b>PARTY POSITIONS</b>	<b>AMOUNT</b>	<b>TRANSCRIPT REFERENCES</b>
<b>Joint Applicants:</b> Support Alternative One. No party disputes the project will benefit customers. For WEPCO and WPSC, it’s an important component of the GRP, the acquisition will provide affordable, reliable and clean generation, take advantage of technological advancements in renewable resources and batteries, and diversify generation portfolios—all to benefit customers. The project is part of the least cost plan for meeting the capacity and energy needs of MGE’s customers—a conclusion Commission staff confirmed.		Direct-WEPCO WPSC-Eidukas-3-8; Ex.-WEPCO WPSC MGE-Application: Appendix C; Direct-MGE-Block-2; Direct-PSC-Grant-pr-20-22; Direct-PSC-Hamil-p-9
<b>CUB:</b> Supports Alternatives Three (a) and Alternative Three (b). The record does not demonstrate that the Commission should grant a CA for the proposed acquisition as filed.		Direct-CUB-Singletary-r-2-18; Surrebuttal-CUB-Singletary-3; Direct-WEPCO WPSC-Gerlikowski-pr-12. Direct-CUB-Kihm-2-21; Surrebuttal-CUB-Singletary-8-9
<b>RENEW:</b> Supports Alternative One (a) and (b).		Direct-RENEW-Vickerman-6-7, 8-9
<b>Commission Staff:</b> Takes no position.		
<b>COMMISSION ALTERNATIVES</b>		
<b>Alternative One (a):</b> For WEPCO and WPSC, the Commission should grant a CA for the proposed acquisition as filed.	<b>Alternative One (b):</b> For MGE, the Commission should grant a CA for the proposed acquisition as filed.	
<b>Alternative Two (a):</b> For WEPCO and WPSC, the Commission should grant a CA for the proposed acquisition as filed, with conditions.	<b>Alternative Two (b):</b> For MGE, the Commission should grant a CA for the proposed acquisition as filed, with conditions.	
<b>Alternative Three (a):</b> For WEPCO and WPSC, the Commission should not grant a CA for the proposed acquisition as filed.	<b>Alternative Three (b):</b> For MGE, the Commission should not grant a CA for the proposed acquisition as filed.	
<b>Commissioner Notes:</b>		

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