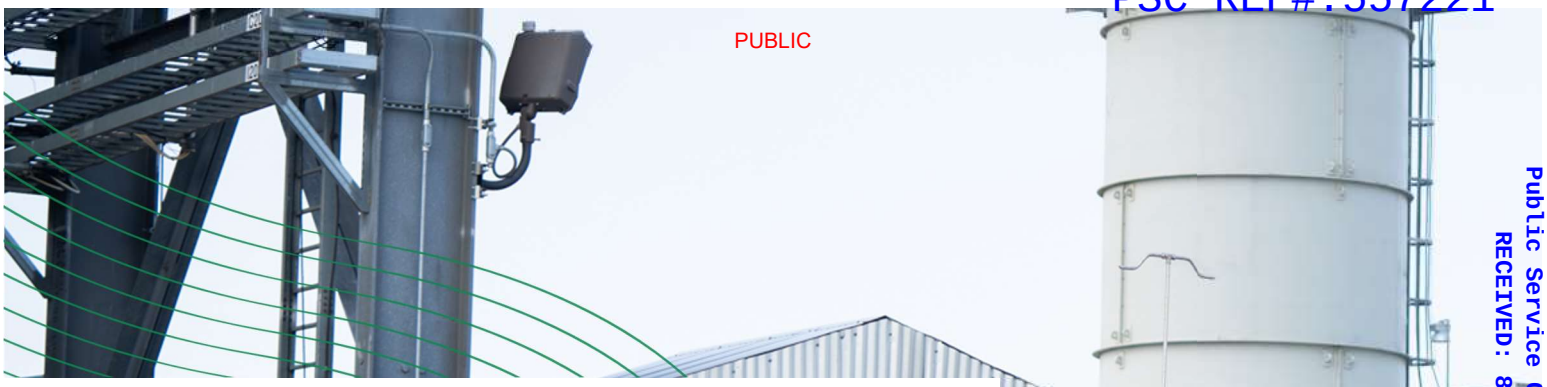

Invenergy

Foundry Ridge Energy Center CPCN Application

Walworth County, Wisconsin

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LIST OF ACRONYMS & ABBREVIATIONS

AC	Alternating Current
AIS	Agricultural Impact Statement
ATC	American Transmission Company
AMSL	Mean Sea Level
BACT	Best Available Control Technology
BESS	Battery Energy Storage System
bgs	Below Ground Surface
BMPs	Best Management Practices
BOP	Balance-of-Plant
CCCW	Closed Cycle Cooling Water
CEMS	Continuous Emissions Monitoring System
CFR	Code of Federal Regulations
cfs	Cubic Feet per Second
CO	Carbon Monoxide
CO_2	Carbon Dioxide
CPCN	Certificate of Public Convenience and Necessity
DPP	Definitive Planning Phase
ECSWMP	Erosion Control and Storm Water Management Plan
EMF	Electric and Magnetic Fields
EPA	Environmental Protection Agency
EPC	Engineering, Procurement, and Construction
ESA	Environmental Site Assessment
FAA	Federal Aviation Administration
FCC	Federal Communications Commission
FCL	Forest Crop Law
ERR	Endangered Resources Review
GHGs	Greenhouse Gases
GE	General Electric
GIA	Generator Interconnection Agreement
gpm	Gallons Per Minute
gr	Grains
GSU	Generator Step-Up
GTG	Gas Turbine Generator
HAP	Hazardous Air Pollutant
HFC	Hydrofluorocarbons
Hg	Mercury
Hz	Hertz
IPaC	Information for Planning and Consultation
IMM	Independent Market Monitor
kV	Kilovolt
kW	kilowatt
MECL	Minimum Emissions Compliance Load
MFL	Managed Forest Law
MGE	Madison Gas & Electric
MISO	Midcontinent Independent System Operator

MVA	Megavoltamperes
MW	Megawatt
NAAQS	National Ambient Air Quality Standards
NFPA	National Fire Protection Association
NO_x	Nitrogen Oxides
NPDES	National Pollution Discharge Elimination System
NRCS	Natural Resource Conservation Service
NRHP	National Register of Historic Places
NRIS	Network Resource Interconnection Service
OEM	Original Equipment Manufacturer
O&M	Operation and Maintenance
Pb	Lead
PFAS	Per- and Polyfluoroalkyl Substances
NSR	New Source Review
NSPS	New Source Performance Standards
PM	Particulate Matter
ppm	Parts Per Million
SEF	Significant Emissions Rates
PSCW	Public Service Commission of Wisconsin
PSD	Prevention of Significant Deterioration
ROW	Rights-of-Way
rpm	Revolutions Per Minute
SO_2	Sulfur Dioxide
SPCC	Spill Prevention, Control, and Countermeasure
SWPPP	Stormwater Pollution Prevention Plan
tpy	Tons Per Year
U.S.	United States
USFWS	United States Fish and Wildlife Service
USGS	United States Geological Society
VOC	Volatile Organic Compound
WDNR	Wisconsin Department of Natural Resources
WE-GO	Wisconsin Electric Gas Operations
WEPCO	Wisconsin Electric Power Company
WisDOT	Wisconsin Department of Transportation
WPDES	Wisconsin Pollutant Discharge Elimination System
WPL	Wisconsin Power & Light
WPSC	Wisconsin Public Service Corporation
WRRD	Wisconsin Remediation and Redevelopment Database

1. Project Proposal

1.1 Project Facilities

1.1.1 Identify the corporate entity or entities that would own and/or operate the proposed plant(s) including their names, addresses, and percent of ownership (Wis. Admin. Code § PSC 111.53(1)(a)4).

Foundry Ridge Energy Center LLC ("Foundry Ridge"), a wholly-owned subsidiary of Foundry Ridge Holdings LLC managed by Invenergy LLC ("Invenergy"), submits this application ("Application") for a Certificate of Public Convenience and Necessity ("CPCN") to the Public Service Commission of Wisconsin ("PSCW") to construct and place in service the Foundry Ridge Energy Center ("Project"), a natural gas-fired simple-cycle combustion turbine-based large electric generating facility ("Facility") with a generation potential of 324 megawatts ("MW") alternating current ("AC") and a 138 kilovolt ("kV") overhead generator transmission tie line ("Gen-Tie Line"). Contact information for representatives of Foundry Ridge in this proceeding is provided in Table 1.

Table 1 Contact Information

Aidan O'Connor Invenergy LLC One South Wacker Drive, Suite 1500 Chicago, IL 60606 (312) 429-2593 aoconnor@invenergy.com	Johnathan Shelton Invenergy LLC One South Wacker Drive, Suite 1500 Chicago, IL 60606 (708) 377-9809 jshelton@invenergy.com
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The Project is a wholesale merchant plant as defined in Wis. Stat. § 196.491(1)(w)1. Foundry Ridge is not a public utility and owns 100% of the Project. Foundry Ridge, provided it receives a CPCN from the PSCW, may directly or indirectly through its affiliates, own, construct, and operate the Project by selling the power using long term power purchase agreements or other available options. Alternatively, Foundry Ridge may sell or assign the Project, or a portion thereof, to one or more public utilities or other qualified entity or entities at any time. Any future buyer or assignee will be required to meet all permit conditions and any power purchase agreement obligations associated with the Project or portion thereof. As part of any such sale or assignment, Foundry Ridge or an affiliate may function as the engineering, procurement, and construction ("EPC") contractor to construct the Project and the operation and maintenance ("O&M") services provider to operate and maintain the Project.

Invenergy is a privately held company that manages business entities with over 24 years of experience responsibly developing, constructing, and operating energy facilities, including wind, solar, storage, natural gas, and transmission. With a track record of more than 200 projects and 34 gigawatts of capacity, Invenergy has experience across the Americas, Europe, and Asia.

In Fond du Lac and Dodge Counties, Wisconsin, Invenergy developed the Forward Wind Energy Center ("Forward Wind"), a 129 MW wind electric generating facility that began operating in 2008 and provides electricity to Wisconsin Public Service Corporation ("WPSC"), Wisconsin Power & Light ("WPL"), and Madison Gas & Electric ("MGE"). (*See* PSC Docket No. 9300-CE-100). Invenergy constructed, owned, and operated Forward Wind for 10 years while providing electricity and renewable energy certificates to its customers. In 2018, Invenergy sold Forward Wind to its customers and will continue to operate the facility through its remaining service life. (*See* PSC Docket No. 05-BS-226).

In Iowa County, Wisconsin, Invenergy developed the Badger Hollow Solar Farm ("Badger Hollow Solar"), a 300 MW solar electric generating facility. (*See* PSC Docket Nos. 9697-CE-100 and 9697-CE-101). Badger Hollow Solar was constructed by Invenergy and is now owned by Wisconsin Electric Power Company ("WEPCO"), WPSC, and MGE. Invenergy operates Badger Hollow Solar on behalf of its customers.

In Kenosha County, Wisconsin, Invenergy developed the Paris Solar Energy Center ("Paris Solar"), a 200 MW solar electric generating facility with a 110 MW battery energy storage system ("BESS"). (*See* PSC Docket No. 9801-CE-100). Paris Solar was constructed by Invenergy and is now owned by WEPCO, WPSC, and MGE. Invenergy operates Paris Solar on behalf of its customers.

In Walworth and Rock Counties, Wisconsin, Invenergy developed the Darien Solar Energy Center ("Darien Solar"), a 250 MW solar electric generating facility with a 75 MW BESS. (*See* PSC Docket No. 9806-CE-100). Darien Solar was constructed by Invenergy and is now owned by WEPCO, WPSC, and MGE. Invenergy operates Darien Solar on behalf of its customers.

In Dane County, Wisconsin, Invenergy developed the Koshkonong Solar Energy Center ("Koshkonong Solar"), a 300 MW solar electric generating facility with a 165 MW BESS. (*See* PSC Docket No. 9811-CE-100). Koshkonong Solar is currently under construction by Invenergy and is now owned by WEPCO, WPSC, and MGE. Invenergy will operate Koshkonong Solar on behalf of its customers.

In Columbia County, Wisconsin, Invenergy developed the High Noon Solar Energy Center ("High Noon Solar"), a 300 MW solar electric generating facility with a 165 MW BESS. (*See* PSC Docket No. 9814-CE-100). High Noon Solar is currently under construction by Invenergy and is now owned by WEPCO, WPSC, and MGE. Invenergy will operate High Noon Solar on behalf of its customers.

In Rock County, Wisconsin, Invenergy developed the Dawn Harvest Solar Energy Center ("Dawn Harvest Solar"), a 150 MW solar electric generating facility with a 50 MW BESS. (*See* PSC Docket No. 9809-CE-100). Invenergy anticipates beginning construction of Dawn Harvest Solar in August 2025.

In Iowa and Grant Counties, Wisconsin, Invenergy developed the Badger Hollow Wind Energy Center ("Badger Hollow Wind"), a 118 MW wind electric generating facility (*See* PSC Docket No. 9827-CE-100). Invenergy anticipates beginning construction of Badger Hollow Wind in August 2026.

1.1.2 Provide a list of all cities, villages, and townships and their respective counties that would be directly affected by the proposed facilities or their connecting utility or railroad routes.

The Project is located in the Town of Darien, Walworth County, Wisconsin. Pursuant to Wis. Admin Code § PSC 111.53(2)(b), applicants are exempt from providing an alternative site for PSCW review if the proposed site is located on the site of an existing large electric generating facility and the generation facility will not constitute a major action significantly affecting the quality of the human environment. The Proposed Site is located on the site of Darien Solar and this Application establishes that the Project does not constitute a major action significantly affecting the quality of the human environment. Nonetheless, in compliance with Wis. Admin. Code § PSC 4.70(2)(b)1 and § PSC 111.53(1)(f), Foundry Ridge has identified Proposed and Alternative Sites for the Facility and corresponding Proposed and Alternative Gen-Tie Lines from each Site respectively. The location of the Proposed and Alternative Sites and Gen-Tie Lines are shown in the Project Area Map in Appendix A.

Wisconsin Electric Gas Operations ("WE-GO") will construct a natural gas pipeline lateral to connect the Facility to the Guardian pipeline. Foundry Ridge expects the natural gas pipeline lateral to be located in the Town of Darien, Walworth County, Wisconsin. Preliminary routing for the natural gas pipeline lateral from WE-GO is not currently available.

1.1.3 Provide contractual agreements between developer and utilities to construct, finance, lease, use or own facilities.

Foundry Ridge executed a Transmission Line Relocation Study Agreement with American Transmission Company ("ATC") to evaluate rebuilding the existing RCEC Bradford to West Darien 138 kV transmission line to accommodate the Alternative Gen-Tie Line. The Transmission Line Relocation Study Agreement is provided in Appendix B. After the conclusion of the Transmission Line Relocation Study and if the Alternative Site and Gen-Tie Line are selected for construction, Foundry Ridge expects to execute a Pole Attachment Agreement with ATC to support the rebuild of the existing RCEC Bradford to West Darien 138 kV transmission line to accommodate the Alternative Gen-Tie Line.

Foundry Ridge executed a Shared Facilities Consent Agreement with WEPCO to support the interconnection of the Proposed Site at the North Creek Substation in association with a Midcontinent Independent System Operator ("MISO") generator interconnection queue position in the MISO East (ATC) Definitive Planning Phase ("DPP")-2025-Cycle. The Shared Facilities Consent Agreement associated with the MISO East (ATC) DPP-2025-Cycle queue position is provided in Appendix B. Additionally, Foundry Ridge expects to execute an additional Shared Facilities Consent Agreement with WEPCO to support the interconnection of the Proposed Site at the North Creek Substation in association with a surplus interconnection service request affiliated with the existing Darien Solar queue position (J850).

Foundry Ridge expects to negotiate a Gas Supply Agreement with WE-GO to supply natural gas to the Facility. WE-GO will be responsible for all activities required for the planning, construction, and operation of the natural gas pipeline lateral and associated metering and interconnection facilities, including studies, evaluations, permits, and regulatory notifications.

Foundry Ridge executed an Option Easement Agreement with WEPCO, WPSC, and MGE to support siting of the Proposed Site and Proposed and Alternative Gen-Tie Lines. The Option Easement Agreement is provided in Appendix B.

1.1.4 Identify the type of power plant proposed (technology and major components required) including any planned additions, possible expansions or other modifications that have been evaluated for the future.

The Facility is a natural gas-fired simple-cycle combustion turbine-based large electric generating facility with a generation potential of 324 MW. The Facility will include three General Electric ("GE") 7E.03 gas turbines and A35 air-cooled generators. Although the Facility will be designed for continuous service, Foundry Ridge anticipates it will primarily operate during periods of peak electrical demand. No additions, expansions, or other modifications are planned at this time. Additional information regarding the components and engineering details of the Facility is provided in Section 4.

1.1.5 Identify any potential for secondary industrial or commercial development that may seek to utilize excess heat or steam energy from the project. Include both the long-term potential as well as any short-term plans for future steam customers.

The Facility will not produce excess heat or steam which could be collected for secondary use.

1.1.6 Identify each proposed generating unit, including its type, size, and fuel. (Wis. Admin. Code § PSC 111.53(1)(a)1 and 2).

The Facility will include three GE 7E.03 gas turbines and A35 air-cooled generators. Each gas turbine generator ("GTG") will have an individual electrical generating capacity of approximately 108 MW, for a total installed capacity of approximately 324 MW. The Facility will be fueled by natural gas and will not include backup fuel capability. Technical datasheets for the gas turbines and generators are provided in Appendix C.

1.1.7 Specify the facility's estimated capacity factors, for each generating unit and the basis for the estimate (Wis. Admin. Code § PSC 111.53(1)(a)6).

The Facility and each GTG are expected to have annual gross and net capacity factors of approximately 20%, with monthly and seasonal variations. Daily and weekly capacity factors may be as high as 100%. In accordance with the Title V Operating Permit, the Facility will have a 12-month rolling fuel based operating limit equivalent to 2,338 hours per GTG operating at 100% load (equivalent to a 27% capacity factor). The fuel-based limit will enable the Facility flexibility to operate more than 2,338 hours per 12-month rolling period when the GTGs are not operating at 100% load. Several drivers will affect the capacity factors including fuel pricing, temporary transmission constraints, efficiency of the Facility, maintenance requirements, power demand, and competing generation resource availability, capacity, and efficiency.

1.1.8 Identify pipelines, truck/train loading and unloading areas, and temporary or permanent on-site storage for:

1.1.8.1 Fuel supply – pipeline, train, truck, etc. plus on-site storage tanks or piles.

WE-GO will construct, own, and operate a natural gas pipeline lateral to connect the Facility to the Guardian pipeline. Foundry Ridge expects the natural gas pipeline lateral to be located in the Town of Darien, Walworth County, Wisconsin. The natural gas pipeline lateral is expected to be approximately 5.3 miles in length for the Proposed Site and approximately 2.5 miles in length for the Alternative Site. The natural gas pipeline lateral is expected to have a diameter of 16 inches. Preliminary routing for the natural gas pipeline lateral from WE-GO is not currently available.

Conditioning equipment will be installed to protect the system and maintain fuel requirements for the Facility. The conditioning equipment will include regulation trains, duplex filter separators, dew point heaters, coalescing filters, a final pressure control skid, and final coalescing filters. Overpressure protection will safeguard the system and duplex filter separators will enhance filtration efficiency. The dew point heater will regulate fuel temperature and prevent condensation. The final pressure control skid will provide stable pressure regulation and final coalescing filters will ensure high fuel purity. A gas chromatograph will be utilized to monitor supply at the gate station. Additional gas storage and compression is not expected to be required.

The Facility will include an emergency backup generator, which in the event of a loss of primary power supply, will provide auto-start and backup power to essential systems. The emergency backup generator will utilize natural gas as fuel and be able to support operation of the Facility's emergency systems as long as natural gas is available from the natural gas pipeline lateral and until maintenance requires the emergency backup generator to be taken offline. Should there be primary power loss, or for testing purposes, an emergency firewater pump will supply water using an electric motor. A separate dedicated electrical feed will connect the emergency backup generator to the emergency firewater pump.

1.1.8.2 Water supply and discharge.

Water will be supplied to the Facility by a new on-site well that will extract groundwater from the Galena-Platteville aquifer. The Proposed Site will require a high-capacity well permit due to the presence of an existing well on the property and the cumulative capacity of both wells. The Alternative Site will require a low-capacity well permit. The water supply system will include redundant pumps and storage capacity to ensure operational reliability.

The wastewater disposal system will be designed to comply with all applicable federal, state, and local regulations, and will provide separate handling for sanitary, process wastewater, and stormwater streams. Any wastewater deemed hazardous will be handled and disposed of in accordance with Wisconsin Department of Natural Resources ("WDNR") permits and all other applicable regulations.

Sanitary wastewater generated at the Facility will be treated through an on-site septic system designed to meet the operational needs of the Facility.

Process wastewater from demineralization of service water and evaporative cooler blowdown will be collected in a wastewater storage tank (approximately 40,000 gallons). The Facility will be designed to recycle wastewater streams where feasible, resulting in a maximum wastewater discharge of approximately 12 gpm (up to 17,800 gallons per day). The majority of this discharge, approximately 10 gpm, originates from evaporative cooler blowdown, which primarily occurs during summer months when ambient temperatures exceed 59ºF. Each gas turbine will be equipped with an individual wash drain storage tank to collect wastewater. These tanks will be installed in an underground containment. Drain tanks will be periodically emptied. The contents within the wastewater storage tank will be hauled off site for treatment or disposed of using existing onsite treatment systems. Non-contact water (evaporative cooling blowdown) may be discharged under the National Pollution Discharge Elimination System ("NPDES") industrial stormwater program, contingent on compliance with Wisconsin Pollutant Discharge Elimination System ("WPDES") effluent discharge standards.

Oil containments and Facility drains will be discharged to an oily-water separator, which consists of a double-walled, leak-monitored underground storage tank. The oily-water separator will be approximately five feet in diameter and 14 feet long. The oily-water-separator-cleaned effluent will be discharged to a stormwater retention pond. Oily-water separator tank contents are expected to be removed from site, on average, once every 6 months.

The stormwater runoff management system will collect and discharge stormwater from the Facility into a stormwater retention pond where it will discharged to groundwater. Any leaked oil will be separated from contact stormwater prior to discharge to the stormwater retention pond. A Stormwater Pollution Prevention Plan ("SWPPP") will be developed and implemented in accordance with federal, state, and local regulations to minimize sediment and pollutant discharge from the site during construction and operation.

1.1.8.3 Steam delivery.

The Facility will not produce steam which could be collected for secondary use.

1.1.8.4 Ash or other waste disposal – pipeline, train, truck, etc. plus on-site storage tanks or piles.

The Facility will not generate solid wastes, such as ash, requiring storage or disposal. Solid wastes will be produced from construction debris, construction workers, and employees during operation of the Facility. These wastes will be collected in trash containers and hauled to a local landfill.

1.1.9 Identify any new or modified electric transmission lines and other electric transmission facilities that might be needed. Include information on who would build the transmission line and interconnection. Describe the specific interconnection queue process the project is participating in.

The Gen-Tie Line will be a three-phase overhead 138 kV transmission line carrying electricity from the Facility to the Darien Solar Substation. The conductor will be properly sized to meet thermal stability, vibration resistance, and any other required technical criteria. Foundry Ridge will modify the Darien Solar Substation to accept the Gen-Tie Line by extending the existing 138 kV bus and installing a circuit breaker and transmission line takeoff structure.

The Proposed Gen-Tie Line will be approximately 900 feet long and connect the Proposed Site to the Darien Solar Substation adjacent to the Facility. The Proposed Gen-Tie Line will likely consist of three to four monopole steel transmission structures. The span length between transmission structures will be approximately 300 to 700 feet. The right-of-way width will be approximately 100 feet. The transmission structure heights will be approximately 95 to 130 feet. Foundry Ridge will be responsible for constructing the Proposed Gen-Tie Line.

The Alternative Gen-Tie Line will connect the Alternative Site to the Darien Solar Substation located approximately 2.2 miles west of the Facility. Approximately 1.8 miles of the Alternative Gen-Tie Line will be double-circuited and attached to the existing RCEC Bradford to West Darien 138 kV transmission line owned by ATC. While Foundry Ridge expects to construct those segments of the Alternative Gen-Tie Line that do not attach to the new RCEC Bradford to West Darien 138 kV transmission line structures, and expects ATC to construct the segments that do, the Transmission Line Relocation Study will determine final construction responsibility, and the Pole Attachment Agreement will require agreement by both parties.

Pursuant to communications with ATC and PSCW staff, Foundry Ridge expects that the improvements associated with the Alternative Gen-Tie Line will qualify for applicable exemptions for Foundry Ridge and ATC afforded under Wis. Stats. § 196.491 and 196.49. The Alternative Gen-Tie Line will deviate no more than 60 feet (for more than one half mile in total) from the centerline of the existing RCEC Bradford to West Darien 138 kV transmission line. As further described in this Application, the Project will not have undue adverse environmental impacts. The Alternative Gen-Tie Line will require the acquisition of one-half mile or less of rights-of-way from landowners from which rights-of-way would not be required to be acquired for the existing electric transmission line. The cost of the rebuild will not exceed the threshold prescribed by Wis. Stat. § 196.49(5g)(ar)1m.b. and updated by Wis. Stat. § 196.49(5g)(b).

The segments of the Alternative Gen-Tie Line that Foundry Ridge expects to construct will likely consist of three to five monopole steel transmission structures. The segments of the Alternative Gen-Tie Line that Foundry Ridge expects ATC to construct will likely consist of eighteen monopole steel transmission structures. The span length between transmission structures will be approximately 500 to 700 feet. The right-of-way width will be approximately 80 to 100 feet. The transmission structure heights will be approximately 95 to 130 feet.

The North Creek Substation, which is directly adjacent to the Darien Solar Substation, will serve as the point of interconnection for both Sites. The location of the Proposed and Alternative Sites and Gen-Tie Lines and the Darien Solar Substation are shown in Project Area Map in Appendix A.

Foundry Ridge filed a MISO generator interconnection queue position (J4028) at the North Creek Substation in the MISO East (ATC) DPP-2025-Cycle for 324 MW deliverable to load via Network Resource Interconnection Service (“NRIS”). As part of the generator interconnection process, MISO will determine if any additional network upgrades are required on the regional transmission system to support the interconnection of the Project. If any network upgrades are identified, they will be permitted separately by their respective facility owners.

In addition to J4028, Foundry Ridge expects to request surplus interconnection service associated with the existing Darien Solar queue position (J850). If this request does not result in a material adverse impact on the regional transmission system or any other system, the Project may interconnect with minimal to no network upgrades. Foundry Ridge does not expect the surplus interconnection request to have a seasonal limitation.

Foundry Ridge expects to negotiate transmission easement agreements for the Alternative Gen-Tie Line. If the property rights necessary to support the Alternative Gen-Tie Line are not obtained, Foundry Ridge may submit a material modification request for J4028 during the multi-year review process to shift the point of interconnection along the RCEC Bradford to West Darien 138 kV transmission line from the North Creek Substation to the Alternative Site Property. This scenario is contingent on PSCW approval of the CPCN and selection of the Alternative Site for construction. In this scenario, Foundry Ridge will provide ATC a graded pad for a new substation (approximately 5 acres) and perform other related construction activities on the Alternative Site Property in accordance with the generator interconnection process and the terms of the Generator Interconnection Agreement ("GIA").

1.1.10 If applicable, provide any associated MISO interconnection studies such as Definitive Planning Phase, Facility Interconnection Agreements, and any signed generator interconnection agreement.

The DPP start date for the MISO East (ATC) DPP-2025-Cycle queue cluster is scheduled for 1/5/26. The GIA associated with J850 is provided in Appendix D.

1.1.11 If applicable, provide the associated MISO interconnection queue position number.

The queue position submitted in the MISO East (ATC) DPP-2025-Cycle queue cluster was assigned as J4028. The queue position number associated with the forthcoming request for surplus interconnection service is J850.

1.1.12 Provide an estimate of the expected life span for the power plant.

The Facility is expected to operate for approximately 30 years but may operate for a longer period.

1.1.13 Describe how the facility would be decommissioned at the end of its life span. Describe expected decommissioning actions and timelines.

Prior to structural demolition, end-of-life decommissioning will include a pre-demolition survey to identify equipment, structures, and any regulated wastes to be removed. Once identified, waste will be removed first for offsite recycling or disposal as appropriate. Then, specifications and drawings will be prepared for bidding by demolition contractors. The selected contractor will establish a demolition schedule. Similar projects required 12 to 24 weeks from contractor mobilization to removal of all facilities. Decommissioned equipment and materials will be evaluated for recycling based on practicability and economic viability. Some Project facilities, such as the Gen-Tie Line, may remain in use or be repurposed after the end of the useful life of the Facility. Project facilities that remain in use or can be repurposed will not be removed during decommissioning. Please see the Decommissioning Plan provided in Appendix E for more information.

1.1.14 Provide an estimate of the cost of and source of funding for decommissioning. State whether financial security would be provided to cover decommissioning costs, including the amount of time it would be provided.

A preliminary decommissioning cost estimate analysis is provided in Appendix E. Based on current pricing, technology, and regulatory requirements, the estimated net decommissioning cost (cost of decommissioning minus any potential estimated resale and salvage value revenue) resulted in a surplus of approximately $875,715.90 for the initial period of Project operation. The cost estimate is non-binding and was determined based on 2025 pricing.

Based on the potential resale and salvage value of the installed equipment, Foundry Ridge believes it is not necessary to create a separate decommissioning funding source during the early stages of operation. Foundry Ridge proposes to update the Decommissioning Plan after ten years of commercial operations. At that time, Foundry Ridge will post a form of financial security—such as a bond, letter of credit, escrow account, reserve fund, parent guarantee or other suitable financial mechanism—if any estimated net cost of decommissioning exists. The Decommissioning Plan will be updated every five years thereafter and the financial security will be adjusted to be consistent with the then current estimated net decommissioning cost.

1.1.15 State how the start of decommissioning would be decided, including a description of what constitutes site abandonment.

At the end of commercial operation, Foundry Ridge will assess whether to decommission or seek to extend the life of the Project. Subject to applicable regulatory approval, if Foundry Ridge decides to pursue continued operation, it will evaluate whether to continue with the existing equipment or to upgrade the Project with newer technologies. If Foundry Ridge does not pursue continued operations or repowering of the Project, the decommissioning process will begin when Foundry Ridge determines the Project is discontinued or after approximately one year without energy production. In the unlikely event that the decommissioning process is not complete within one year following the termination of commercial operations, the Project will be considered abandoned.

2. Project Costs

Provide the anticipated overall costs for the proposed project (see Section 4.0).

The Project is a wholesale merchant plant as defined in Wis. Stat. § 196.491(1)(w)1; therefore, in accordance with PSC 111.53(2)(a), this information need not be provided.

2.1 Project Sites

Describe and provide in maps the following items that are applicable to the proposed project.

2.1.1 Locations and footprints of the Proposed site and Alternative site(s).

The Project is located in the Town of Darien, Walworth County, Wisconsin. Pursuant to Wis. Admin Code § PSC 111.53(2)(b), applicants are exempt from providing an alternative site for PSCW review if the proposed site is located on the site of an existing large electric generating facility and the generation facility will not constitute a major action significantly affecting the

quality of the human environment. The Proposed Site is located on the site of Darien Solar and this Application establishes that the Project does not constitute a major action significantly affecting the quality of the human environment. Nonetheless, in compliance with Wis. Admin. Code § PSC 4.70(2)(b)1 and § PSC 111.53(1)(f), Foundry Ridge has identified Proposed and Alternative Sites for the Facility and corresponding Proposed and Alternative Gen-Tie Lines from each Site respectively. The location of the Proposed and Alternative Sites and Gen-Tie Lines are shown in the Project Area Map in Appendix A.

The Proposed Site is located in Section 19, Township 2 North, Range 15 East. The permanent footprint of the Proposed Site is approximately 16 acres. An additional approximately 15 acres will be temporarily disturbed during construction of the Proposed Site. The Proposed Gen-Tie Line is located in Section 19, Township 2 North, Range 15 East. The Proposed Gen-Tie Line right-of-way is approximately 2 acres.

The Alternative Site is located in Section 21, Township 2 North, Range 15 East. The permanent footprint of the Alternative Site is approximately 15 acres. An additional approximately 9 acres will be temporarily disturbed during construction of the Alternative Site. The Alternative Gen-Tie Line is located in Sections 19 – 21, Township 2 North, Range 15 East. The Alternative Gen-Tie Line right-of-way is approximately 22 acres.

2.1.2 General geology, topography, land cover, and land use of each site.

The Project Area is located within the Rock River Drift Plain of southeastern Wisconsin, a physiographic region intensely shaped by multiple glacial advancements during the Wisconsin Glaciation (75,000 to 11,000 years ago). Once dominated by a mosaic of tall-grass prairies, oak savannas and lowland hardwoods, the region now predominantly consists of agricultural farmland with fragmented woodland and remnant prairies typically limited to narrow riparian zones.

Characterized by wide, level outwash plains and terraces of deeply weathered loamy and silty soils, the landscape is relatively flat with an approximate elevation of 860 to 920 feet above mean sea level ("AMSL"). The surficial topography is underlain by Quaternary aged unconsolidated glacial sediments from the Walworth and Holly Hill Formation which extend 150 to 200 feet below ground surface ("bgs"). The Sinnipee Group, which forms the uppermost bedrock layer within the Project Area, is comprised of Silurian aged dolomite, limestone, and shale from the Galena, Decorah, and Platteville formations.

The Bedrock Type Mapbook provided in Appendix A identifies the type of bedrock within the Project Area. The Depth to Bedrock Mapbook in Appendix A identifies the depth to bedrock within the Project Area. The Topographic Mapbook provided in Appendix A identifies the topography within the Project Area.

HDR, Inc. ("HDR") reviewed and revised land cover data from the National Land Cover Database ("NLCD") based on aerial imagery and field investigations performed by Foundry Ridge representatives in summer 2025. Land cover in the Project Area is primarily cultivated

crops (63.3%) followed by developed open space (22.7%), developed medium intensity (10.4%) and other land cover types, as identified in Table 2.

Table 2 Land Cover in Project Area

Project Area Land Cover	Area (Acres)
Planted/Cultivated - Cultivated Crops	121.68
Planted/Cultivated - Pasture/Hay	0.26
Developed Open Space	43.37
Developed Medium Intensity	18.37
Developed High Intensity	6.14
Developed Low Intensity	0.60
Total	**190.42**

The Proposed Site is located on a currently vacant portion of Darien Solar. This land was historically used for row crop agriculture but was developed as part of the construction of Darien Solar. Construction on this site included grading and other associated construction activities. The site was seeded with a mix intended for erosion control and site stabilization. The surrounding land uses include industrial/commercial, agriculture, and developed (residential). Creek Road is located south of the Proposed Site and North Road is located east of the Proposed Site. The Proposed Gen-Tie Line will primarily cross land characterized as developed medium intensity and developed open space.

The Alternative Site is currently used for row crop agriculture, primarily corn (*Zea mays*) and soybeans *(Glycine max*). The surrounding land uses include more row crop agriculture, developed (residential), and industrial/commercial. A biosolid management facility is located south of the Alternative Site. United States ("U.S") Interstate 43 and U.S. Highway 14 and are located to the south and west of the Alternative Site respectively. The Alternative Gen-Tie Line will primarily cross land characterized as cultivated crops and developed open space. The Land Cover Mapbook provided in Appendix A identifies the land cover within the Project Area.

2.1.3 Any special or unique natural or cultural resources.

No special or unique natural resources or WDNR or United States Fish and Wildlife Service ("USFWS") managed properties, National Resource Conservation Service ("NRCS") easements, or public forests are present in the Project Area. Additional information regarding natural resources is provided in Section 6.

One archaeological site (WL-0395) was identified on the Alternative Site Property during an archaeological field survey. The site is comprised of a lithic surface scatter and has not been evaluated for eligibility for listing on the National Register of Historic Places ("NRHP"). Please see Section 6.7 for more information regarding cultural resources, including mapping.

2.1.4 Adjacent areas of residential concentrations.

The population concentration nearest the Proposed and Alternative Sites is the Village of Darien, which is located approximately 2.3 miles from the Proposed Site and 0.19 miles from the Alternative Site. The population of the Village of Darien is 1,573. The Project Area Map

provided in Appendix A identifies areas of residential concentration proximal to the Project Area.

2.1.5 Existing area utilities, including electric transmission, natural gas, and water.

The Project Area Map provided in Appendix A identifies existing area utilities, including electric transmission, natural gas, and water proximal to the Project Area.

2.1.6 Expected connecting utilities.

The Proposed Gen-Tie Line will be approximately 900 feet long and connect the Proposed Site to the Darien Solar Substation adjacent to the Facility. The Alternative Gen-Tie Line will connect the Alternative Site to the Darien Solar Substation located approximately 2.2 miles west of the Facility. The North Creek Substation, which is directly adjacent to the Darien Solar Substation, will serve as the point of interconnection for both Sites.

Foundry Ridge expects to negotiate transmission easement agreements for the Alternative Gen-Tie Line. If the property rights necessary to support the Alternative Gen-Tie Line are not obtained, Foundry Ridge may submit a material modification request for J4028 during the multi-year review process to shift the point of interconnection along the RCEC Bradford to West Darien 138 kV transmission line from the North Creek Substation to the Alternative Site Property. This scenario is contingent on PSCW approval of the CPCN and selection of the Alternative Site for construction. In this scenario, Foundry Ridge will provide ATC a graded pad for a new substation (approximately 5 acres) and perform other related construction activities on the Alternative Site Property in accordance with the generator interconnection process and the terms of the GIA.

WE-GO will construct, own, and operate a natural gas pipeline lateral to connect the Facility to the Guardian pipeline. Foundry Ridge expects the natural gas pipeline lateral to be located in the Town of Darien, Walworth County, Wisconsin. The natural gas pipeline lateral is expected to be approximately 5.3 miles in length for the Proposed Site and approximately 2.5 miles in length for the Alternative Site. The natural gas pipeline lateral is expected to have a diameter of 16 inches. Preliminary routing for the natural gas pipeline lateral from WE-GO is not currently available.

Water will be supplied to the Facility by a new on-site well. The Proposed Site will require a high-capacity well permit due to the presence of an existing well on the property and the cumulative capacity of both wells. The Alternative Site will require a low-capacity well permit. The water supply system will include redundant pumps and storage capacity to ensure operational reliability.

2.1.7 Railroad lines and potential connections to them.

The Project Area Map provided in Appendix A identifies railroad line locations proximal to the Project Area. The nearest railroad line is located 1.35 miles southwest from the Proposed Site and 2.15 miles southwest of the Alternative Site. No connections to railroad lines will be required for the Project.

2.2 Site Selection Process

Describe the site screening and selection process used to determine the Proposed site and Alternative site(s).

2.2.1 List individual factors or site characteristics used in site selection.

Development of a natural gas-fired electric generating facility is an iterative process that involves general site identification, project area refinement, and micro-siting of infrastructure. During the site selection process several factors and site characteristics were considered including:

- Electrical demand;
- Existing infrastructure;
- Water availability;
- Property rights;
- Land use and zoning;
- Land cover;
- Topography;
- Geology;
- Soils;
- Sensitive habitats;
- Threatened and endangered species;
- Cultural resources;
- Wetlands;
- Waterways;
- Hydrology;
- Floodplains;
- Noise;
- Light;
- Air quality;
- Visual impacts;
- Airspace;
- Brownfields;
- Microwave and communication paths;
- Recreation and publicly owned lands; and
- Public outreach and community feedback.

2.2.2 Provide information on how individual factors and site characteristics were weighted for your analysis and why specific weights were chosen.

All of the factors and site characteristics are important for the successful development of a natural gas-fired electric generating facility and thus were equally weighted during the site selection process.

2.2.3 Explain in detail how brownfields were considered in the selection of sites to propose (Wis. Stat § 196.491(3)(d)8).

Wis. Stat. § 238.13(1)(a) defines a brownfield as "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." Wis. Stat. § 196.491(3)(d)8 requires brownfields to be used to the extent practicable for large electric generating facilities.

A comprehensive list of brownfield sites was accessed from the United States Environmental Protection Agency ("EPA") RE-Powering Mapper[1]. The potential use of existing brownfield sites was evaluated in consideration of the factors and site characteristics identified in Section 2.2.1. No brownfield sites reviewed were identified as suitable for the Project, primarily due to the limited size and location of the available brownfield locations. However, the Proposed Site is collocated with Darien Solar.

Foundry Ridge relied on Environmental Protection Agency data rather than the Wisconsin Remediation and Redevelopment Database ("WRRD")[2] to identify brownfields because not all sites listed in the WRRD are brownfields. The WRRD lists all sites where the discharge of a hazardous substance has been reported and either the site has been remediated, is being remediated, requires no further action, or has ongoing remediation obligations. Many of those sites are still used and useful to the property owner or may already have been redeveloped, and do not meet the definition of a brownfield. The WRRD does not indicate which of the sites WDNR considers brownfields.

2.2.4 Provide a list of all sites reviewed with weighted scores for each siting factor or characteristic, including the brownfield requirement, used in the analysis.

As outlined in Section 2.2.1, Foundry Ridge considered several factors and site characteristics during the site selection process, of which the brownfield designation was one. No brownfield sites reviewed were identified as suitable for the Project, primarily due to the limited size and location of the available brownfield locations. However, the Proposed Site is collocated with Darien Solar.

2.2.5 Provide a narrative describing and justifying why the final site(s) was/were chosen.

The Proposed and Alternative Sites were selected as favorable conditions in relation to the factors and site characteristics identified in Section 2.2.1 are present at both Sites. Of note, the Proposed Site is located on a currently vacant portion of Darien Solar, increasing the land use efficiency of the complex. The Alternative Site is located near multiple industrial/commercial sites, including a biosolid management facility, and U.S. Interstate 43 and U.S, Highway 14. The Proposed and Alternative Sites leverage existing utility infrastructure and minimize impacts to the community to the extent practicable.

2.2.6 If two alternative sites are different configurations on the same parcel of land, explain and justify why they are the alternatives selected for the proposal.

[1] U.S. Environmental Protection Agency (US EPA). 2024. RE-Powering Mapper - Geospatial information for Brownfield Properties with latitude/longitude data.
[2] https://dnr.wisconsin.gov/topic/Brownfields/WRRD.html

The Proposed and Alternative Sites are not different configurations on the same parcel of land; therefore, this Section is not applicable.

2.3 Permits and Approvals

2.3.1 Provide copies of all official correspondence between the applicant and all state, federal, or local government agencies as described in the Introduction, page v.

Copies of all official correspondence between Foundry Ridge and state, federal, or local government agencies is provided in Appendix F.

2.3.2 Provide a list of all state and federal permits/approvals that would be required for this project and their status.

Federal- and state-level permits and approvals that may be necessary for the construction or operation of the Project are identified in Table 3.

Table 3 Preliminary List of Federal and State Permits and Approvals

Agency	Permit/Approval	Notes	Status
Federal			
Federal Aviation Administration	Determination of No Hazard to Air Navigation	7460 Notice of Proposed Construction or Alteration required for construction of structures >200 feet tall or possibly for shorter structures within 5 miles of airport runways greater than 3,200 feet in length. See 14 Code of Federal Regulations ("CFR") S77.13.	Not required at this time
United States Fish and Wildlife Service	Endangered Species Act Review	Consultation is required if the Project may impact federally listed species or designated critical habitats. Consultations result in a written biological opinion of whether the project is likely to jeopardize a listed species or adversely modify designated critical habitat. Endangered Species Act Review includes potential for Incidental Take Permit.	Not required at this time
United States Army Corps of Engineers	Section 401 Water Quality Certification	Impacts to jurisdictional water resources will be avoided and minimized to the extent practicable. The	Not required at this time

Agency	Permit/Approval	Notes	Status
		Project will be evaluated to determine the appropriate authorization for unavoidable impacts.	
	Section 404 Wetland Permit	Impacts to jurisdictional water resources will be avoided and minimized to the extent practicable. The Project will be evaluated to determine the appropriate authorization for unavoidable impacts.	Not required at this time
State			
Public Service Commission of Wisconsin	Certificate of Public Convenience and Necessity (Wis. Stat. § 196.491)	Required for construction of a large electric generating facility or high-voltage transmission line.	In progress
Wisconsin Department of Natural Resources	Air Pollution Control Construction Permit (Wis. Stat. § 285, NR 405-408)	Required for construction and operation of a new source of air emissions.	In progress
	Prevention of Significant Deterioration ("PSD") Permit	Required for construction and operation of a new source of air emissions.	Not required at this time
	Title V Air Permit (Wis. Admin. Code Ch. NR 407)	Required for construction and operation of a new source of air emissions.	In progress
	Wisconsin Pollutant Discharge Elimination System Construction Stormwater General Operating Permit (Wis. Stat. Ch. 283, Wis. Admin. Code Chs. NR 205, 216 & NR 151)	Required for land disturbance or construction activities that disturb one or more acres with a point source discharge to surface waters of the United States.	Not started
	Water Quality Certification (NR 103 and 299)	For any activities subject to U.S. Army Corps of Engineers Section 404 permitting, WDNR must issue Water Quality Certification.	Not required at this time

Agency	Permit/Approval	Notes	Status
	Wetland Fill Permit (Wis. Stat. Ch. 281)	Impacts to wetland resources will be avoided and minimized to the extent practicable. The Project will be evaluated to determine the appropriate authorization for unavoidable impacts.	Not required at this time
	Construction Affecting Navigable Waterways (Wis. Stat. Ch. 30)	Impacts to jurisdictional water resources will be avoided and minimized to the extent practicable. The Project will be evaluated to determine the appropriate authorization for unavoidable impacts.	Not required at this time
	Wisconsin Pollutant Discharge Elimination System Individual Permit (Wis. Stat. Ch. 283)	Required for discharge of non-contact cooling water, air conditioning condensate, and similar discharges free of toxic substances to surface waters of the United States or seepage systems.	Not started
	Incidental Take of Threatened or Endangered Resource (Wis. Stat. Ch. 29)	Consultation and the potential for an Incidental Take Permit is required if state listed species are impacted.	Not required at this time
	Water Use Approval (Wis. Stat. § 281.35, Wis. Admin. Code Ch. 142)	Required for construction of a private well.	Not started
	Private Well Notification Number	Required for construction of a private well.	Not started
	Well Permit (Wis. Stat. § 280, Wis. Admin. Code Ch. NR 812)	Required for construction of a new well.	Not started
	High Capacity Well Permit (Wis. Stat. § 281.34; Wis. Admin. Code § NR 812.09)	Required for construction of a well, or well system on the same property, that has a capacity of more than 100,000 gallons per day.	Not started
	Water Treatment and Conditioning	Required for water treatment and conditioning facilities	Not started

Agency	Permit/Approval	Notes	Status
	Permit (WI-0046450-6)	that result in discharges of backwash water, regeneration water, concentrate or reject water, unit wash water or drainage water, or other similar wastewaters associated with water treatment processing that are discharged to surface waters or indirectly to groundwaters via seepage.	
	Concrete Products Operations Permit (WI-0046507-6)	Required for construction and operation of a concrete batch plant.	Not started
United States Environmental Protection Agency, Wisconsin Department of Natural Resources	Title IV Acid Rain Permit	Required for construction and operation of a new source of air emissions.	In progress
Wisconsin Department of Transportation	Oversize-Overweight Vehicle Permit	Required for any vehicles exceeding posted limits on state roads.	Not started
	Right-of-Way Permit	Required for any construction in state highway right-of-way.	Not started
	Utility Permit	Required for construction or maintenance of a utility facility in state highway right-of-way.	Not started
Wisconsin Department of Safety and Professional Services	Construction of all Buildings and Structures	Required approval of plans and specifications under Wis. Stat. §101.02.	Not started
	Installation of Fuel or Lubricating Oil Storage Tanks	Required approval of plans and specifications under Wis. Stat. §101.09.	Not started
	Installation of Dust Filtering and HVAC Equipment	Required approval of plans and specifications under Wis. Stat. §101.12.	Not started
	Installation and Registration of Boilers, Pressure	Requires an initial inspection after construction, annual thereafter. (Wis. Stat. § 101.17.)	Not started

Agency	Permit/Approval	Notes	Status
	Vessels, and Power Piping		
	Sanitary Permit	Required under Wisconsin Privacy Law, Wis. Stat. § 15.04(1)(m).	Not started
Wisconsin Historical Society	Archaeological Survey Approval	Approval of archaeological surveys (Wis. Stat. § 44.40) and Section 106 of National Historic Preservation Act.	In progress
Wisconsin Department of Agriculture, Trade, and Consumer Protection	Storage Tank Permit, Form ERS-7658	Required for flammable, combustible, and hazardous liquid storage. Tank registration is required for aboveground tanks over 5,000 gallons in size.	Not started

2.3.3 Provide a list of all local permits or approvals that apply to the proposed project, including the local agency, contact information, and status of each permit or approval.

Local permits and approvals that may be necessary for the construction or operation of the Project are identified in Table 4**.** Foundry Ridge may apply for local permits to facilitate cooperation with local governments. In the event local permits are withheld or delayed, installation and utilization of the facility may nevertheless proceed under Wis. Stat. § 196.491(3)(i).

Table 4 Preliminary List of Local Permits and Approvals

Agency	Permit/Approval	Notes	Status
Local			
Walworth County Land Use & Resource Management Department	Construction Site Erosion and Sediment Control General Permit	Required for land disturbance or construction activities that disturb one or more acres.	Not started
Walworth County Public Works Department	Utility Permit	Required for construction or maintenance of a utility facility in county highway right-of-way.	Not started
Walworth County Public Works Department	Driveway Permit	Required for construction of a new driveway entrance on county roads.	Not started

Agency	Permit/Approval	Notes	Status
Walworth County Public Works Department	Oversize Overweight Permit	Required for any vehicles exceeding posted limits on county or town roads.	Not started
Town of Darien	Driveway and Culvert Permit	Required for construction of a new driveway entrance on town roads.	Not started
Town of Darien	Permit to Construct Utilities in Right of Way	Required for construction or maintenance of a utility facility in town highway right-of-way.	Not started
Town of Darien	Building Permit	Required to construct a building in the town.	Not started

2.3.4 Identify railroad facilities that could be affected by the project.
2.3.5 Identify railroad facilities by location and owner that could be affected by the project.
2.3.6 Provide documentation, if possible, that the proposed construction is acceptable to the company.

The Project Area Map provided in Appendix A identifies railroad line locations proximal to the Project Area. The nearest railroad line is located 1.35 miles southwest from the Proposed Site and 2.15 miles southwest of the Alternative Site. No railroad lines will be affected by the Project; therefore, no documentation is necessary.

2.3.7 Identify utility pipelines that could be affected by the project.
2.3.8 Identify the owners of the utility pipeline facilities.
2.3.9 Provide documentation, if possible, that the proposed construction is acceptable to the companies.

The Project Area Map provided in Appendix A identifies existing area utilities, including electric transmission, natural gas, and water proximal to the Project Area. Foundry Ridge has been in correspondence with WE-GO regarding the Project and expects to negotiate a Gas Supply Agreement with WE-GO to supply natural gas to the Facility. WE-GO will construct, own, and operate a natural gas pipeline lateral to connect the Facility to the Guardian pipeline owned by Guardian Pipeline L.L.C. The parent company of Guardian Pipeline L.L.C is DT Midstream. Foundry Ridge expects the natural gas pipeline lateral to be located in the Town of Darien, Walworth County, Wisconsin. Preliminary routing for the natural gas pipeline lateral from WE-GO is not currently available. WE-GO will be responsible for all activities required for the planning, construction, and operation of the natural gas pipeline lateral and associated metering and interconnection facilities, including studies, evaluations, permits, and regulatory notifications.

2.4 General Construction Schedule

2.4.1 Provide the anticipated general construction schedule.

Construction of the Project is planned to begin in Q3 2026 and be completed in Q1 2028, contingent on successful permitting, agency approvals, and other development and pre-construction activities. Table 5 identifies the preliminary construction schedule for the Project. The construction schedule may be impacted by events outside of Foundry Ridge's control, such as unanticipated issues with equipment procurement, contracting, weather, or other scheduling factors. Seasonal standdowns may occur during construction.

Table 5 Preliminary Construction Schedule

Activity	Start	End
Start of Construction	September 1, 2026	
Site Clearing and Grubbing	September 1, 2026	September 15, 2026
Temporary Access Roads	September 16, 2026	October 15, 2026
Site Offices and Laydown Yard	September 16, 2026	September 30, 2026
Grading and Underground(s)	September 30, 2026	February 28, 2027
BOP Foundations	October 31, 2026	March 31, 2027
Gas Turbine 1 Foundations	November 1, 2026	March 31, 2027
Gas Turbine 2 Foundations	December 1, 2026	April 30, 2027
Gas Turbine 3 Foundations	January 1, 2027	May 31, 2027
Mechanical Erection	December 1, 2026	August 31, 2027
Structural Erection	February 1, 2027	August 31, 2027
Piping	April 1, 2027	October 31, 2027
Electrical Installation	November 1, 2026	November 15, 2027
Testing & Pre-commissioning	October 1, 2027	January 31, 2028
Hot Commissioning	December 1, 2027	February 31, 2028
Performance Tests	January 15, 2028	March 15, 2028
Commercial Operations	March 31, 2028	

2.4.2 Provide documentation for all discussions with pipeline operators pertaining to maintaining safety and reliability of the pipeline during construction.

Prior to initiating construction, all crossings of Project infrastructure with existing infrastructure will be field located by a licensed land surveyor. Crossing agreements with the owners of the infrastructure identified will be negotiated, as appropriate. If a pipeline crossing is identified, the pipeline operator will be engaged to develop a plan to design, construct, and maintain Project facilities in a manner that does not interfere with the safety, reliability, and access of the pipeline. Safety and reliability of the natural gas pipeline lateral will be coordinated by Foundry Ridge, WE-GO, and Guardian Pipeline L.L.C./DT Midstream prior to construction.

2.4.3 Provide a description of all major construction activities including any temporary roads, dewatering wells, stream enclosures or re-routing, or other facilities or landscape changes required during construction.

The first step in construction will be to survey, stake, and prepare workspaces for clearing. Appropriate safety measures will be implemented before excavation, including notification through the Wisconsin one-call system to ensure third-party utilities are properly marked. Erosion control measures will be implemented according to the Project's Erosion Control and Stormwater Management Plan ("ECSWMP") and applicable permit conditions. Environmentally sensitive areas will be clearly marked to designate them as avoidance areas. Workspaces will then be cleared and graded, as necessary, to provide construction access and facilitate the safe movement of equipment and personnel.

Temporary construction workspaces and laydown areas will be established and include trailers with administrative offices, employee parking, water service, power service, portable latrines, tool sheds, storage containers, and space for delivery and storage of equipment and materials. Construction workspaces will be fenced, as needed, to prevent access by wildlife or unauthorized personnel. A temporary concrete batch plant may be installed to prepare foundations and supply concrete on site.

During construction, measures will be taken to prevent excessive particulate matter emissions from vehicular traffic and construction activities. These measures may include seeding, straw, adding a gravel layer, covering, wetting, or otherwise controlling particulate matter emissions. Materials suitable for backfill will be stored outside of floodplains and other regulated areas. Proper stormwater erosion control, pollution prevention methods, and best management practices ("BMPs") will be implemented as required by WDNR and applicable regulations.

After site clearing and grading, foundation installation for the main equipment (gas turbines, generators, generator step-up ("GSU") transformers, tanks and auxiliaries, etc.) will begin. Main equipment will be set on their foundations upon delivery to the site. Construction of the three gas turbine trains will occur in sequential order. After structural steel erection, mechanical erection, piping, and electrical installation will occur. Underground installation of the grounding/earthing network will begin early in the construction process and continue progressively as other work areas are completed by the foundation, structural, or mechanical crews.

Testing and pre-commissioning activities will begin after a gas turbine train has been fully installed including applicable auxiliary equipment. After all three gas turbine trains have been tested and pre-commissioned, hot commissioning will occur. After achieving commercial operation, temporary construction workspaces will be restored by decompacting the subsoil, replacing the topsoil, and installation of vegetation consistent with WDNR Technical Standard 1059 "Seeding for Construction Site Erosion Control". Following seed installation, a mulch application will occur following the practices described in the WDNR Technical Standard 1058 "Mulching for Construction Sites".

Construction of an overhead transmission line generally follows a sequence of pre-construction surveying, right-of-way clearing, mat placement and access route grading (if necessary), foundation installation, structure assembly and erection, conductor, optical ground wire (if applicable), and shield wire installation, ground rod installation, demobilization, and site restoration.

Transmission structures will either be secured by concrete drilled pier foundations or direct embedment, backfilling with crushed rock, native soils, or concrete slurry. Concrete drilled pier foundation installation typically involves excavating and placing temporary or permanent casing, rebar, anchor bolt cages, and concrete. The concrete pier typically projects one to two feet above surface grade. Direct embedding typically involves drilling or digging a hole for each structure, partially filling the hole with crushed rock, and then setting the structure on the top of the rock base. The area around the structure is then backfilled with crushed rock or soil once the structure is set. Excess soil from the excavation may be spread and leveled near the structure. Foundations will vary from approximately three to eight feet in diameter and 20 to 30 feet or more in depth, each depending on soil conditions observed during final geotechnical investigation.

After the concrete drilled pier foundation is set and cured, the transmission structures will be assembled, erected, and bolted to the foundation. The bottom section of larger structures is typically bolted to the foundation independently. The upper structures are typically attached from the top down using a crane. If the structure is directly embedded, it is typically assembled on the ground then installed into the backfilled foundation hole. Conductor and overhead ground wire stringing will be performed with the use of temporary pulling and tensioning sites set up near dead-end structures. After construction, workspaces will be restored by decompacting the subsoil, replacing the topsoil, and seeding in accordance with landowner requests or standards established in the WDNR Technical Standard 1059 “Seeding for Construction Site Erosion Control”.

No dewatering wells or stream enclosures or re-routing is anticipated to be required during construction.

2.4.4 Identify any potential seasonal or regulatory construction constraints by facility and major component.

Underground and foundation works, including cast-in-place concrete, will be limited during wintertime, although special measures may be implemented to ensure it is not a limiting factor to maintain schedule.

2.4.5 Identify all critical path items.

The following items are critical path for the Project:

- Receipt of permits
- Below ground utilities and foundation construction
- Major equipment deliveries
- Mechanical construction
- Electrical construction
- Startup and commissioning of equipment

2.4.6 Generally discuss any generation or transmission outage constraints that may have to be accommodated. Include any documentation pertaining to discussions with MISO or generation facility owners about such constraints.

Temporary outage of Darien Solar is expected to be required to accommodate interconnection of the Project at the Darien Solar Substation. Temporary outage of the RCEC Bradford to West

Darien 138 kV transmission line is expected to be required to accommodate the Alternative Gen-Tie Line. The rebuild of the RCEC Bradford to West Darien 138 kV transmission line is currently under evaluation as part of the Transmission Line Relocation Study with ATC. Foundry Ridge will discuss the necessary outages with the facility owners and MISO prior to construction of the Project.

2.5 Mailing Lists

2.5.1 Provide Microsoft Excel mailing lists in an acceptable format that are able to be cross-referenced with GIS parcel data as described in the Introduction, pages iii-iv.

Please see Appendix G for the requested information.

2.5.2 Identify the sources of the information contained in the mailing lists and discuss the potential for inaccuracies in the data set (new development, poor data, etc.).

The information provided in Appendix G was obtained from the open data portals published by Walworth County's Land Information Division and Rock County's Land Information Office. Potential inaccuracies in the data could occur due to the native inaccuracies of the county data and the length of time between the initial data download date and submission of this Application. There may be new developments, ownership transfers, or other changes that are not reflected in Appendix G.

2.5.3 Provide a list of libraries that the application will be mailed to.

In accordance with Wis. Stat. § 196.491(3)(a)1, Table 6 lists the libraries the Application will be mailed to.

Table 6 Libraries

Name	Address
Darien Public Library	47 Park St, Darien, WI 53114
Lake Geneva Public Library	918 W Main St, Lake Geneva, WI 53147

2.5.4 Mailing lists must include:

2.5.5 All property owners within one mile of the Proposed and Alternative power plant sites. It is strongly recommended that applicants consult with PSC staff in order to ensure that the coverage is appropriate considering the project type, surrounding land use, etc. Include properties on both sides of a street or road.

2.5.6 All public property owners such as schools or other government entities within 0.5 mile.

2.5.7 The clerks and chief executive officers of the counties, towns, villages, or cities in which the routes or other proposed facilities would occupy. Also include on this list the main public library in each county the proposed facilities would occupy.

2.5.8 The Regional Planning Commissions in whose jurisdictions the facilities would be built.

2.5.9 Applicable state and federal agencies.

Please see Appendix G for the requested information.

2.5.10 Tribal government representatives for Native American Tribes that hold off-reservation treaty rights in Ceded Territory. This only applies to projects within the following counties: Ashland, Barron, Bayfield, Burnett, Chippewa, Clark, Douglas, Dunn, Eau Claire, Florence, Forest, Iron, Langlade, Lincoln, Marathon, Marinette, Menominee, Oconto, Oneida, Polk, Portage, Price, Rusk, Sawyer, Shawano, St. Croix, Taylor, Vilas, Washburn, and Wood County.

2.5.11 The following Tribes hold off-reservation treaty rights in Ceded Territory:

- **Bad River Band of Lake Superior Chippewa Indians**
- **Lac Courte Oreilles Band of Lake Superior Chippewa Indians**
- **Lac du Flambeau Band of Lake Superior Chippewa Indians**
- **Red Cliff Band of Lake Superior Chippewa Indians**
- **St. Croix Chippewa Indians of Wisconsin**
- **Sokaogon Chippewa Community (Mole Lake Band of Lake Superior Chippewa Indians).**

The Project is not located in a county listed in Section 2.5.10; therefore, these Sections are not applicable.

2.6 Project Maps and Illustrations

Provide project maps, figures, illustrations, etc. that clearly portray the project in a format and scale that is unambiguous and easy to understand. Labels and symbology used on the maps must be clearly visible. The range of required maps/illustrations and whether they should be submitted electronically or in paper form will be discussed during the pre-application consultations.

- **Aerial Imagery**
  Must be the most recent aerial available, not more than three years old. Encompass at least one mile beyond generation site boundaries and all connecting facilities.

- **Facilities Data**
  Must illustrate at least one-half mile from the project boundary. Project boundaries will be defined at pre-application consultations.
  - **Proposed and Alternative sites**
  - **Proposed and Alternative facilities and footprints**
  - **Proposed and Alternative utility connections**
  - **Proposed and Alternative access roads (temporary and permanent)**
  - **Any necessary new railroads and barge docks**
  - **All temporary laydown, material storage areas, and construction parking areas**

Please see the following maps provided in Appendix A for the requested information:

- Project Area Map;
- Proposed Site General Arrangement Schematic;
- Proposed Site Equipment Layout Schematic;
- Proposed Site Construction Facilities Plan Schematic;
- Alternative Site General Arrangement Schematic;

- Alternative Site Equipment Layout Schematic; and
- Alternative Site Construction Facilities Plan Schematic.

No new railroads or barge docks are associated with the Project.

- **Environmental Data**
  - **Rivers, lakes, and other waterways**
  - **Outstanding or Exceptional Waterways, Trout Streams, Wild or Scenic Rivers**
  - **Field-delineated wetlands and Wisconsin Wetland Inventory wetlands**
  - **Soils and hydric soils**
  - **Geology**
  - **NHI rare species occurrences (confidential)**
  - **USGS topographic maps**
  - **Floodplains (Flood Insurance Rate Map data)**

Please see the following maps provided in Appendix A for the requested information:

- Water Resources Map;
- Wetland and Waterway Crossings Aerial Mapbook;
- Soil Survey Mapbook;
- Bedrock Type Mapbook;
- Depth to Bedrock Mapbook; and
- Topographic Mapbook.

All soils in the Project Area classify as non-hydric. No required actions for NHI rare species occurrences were identified. Please see Section 9 for more information.

- **Parcel Data**
  Must include properties within one-half mile of the project boundary.
  - **Private parcels with ownership information**
  - **Public properties (symbolized differently than private properties)**
  - **Tribal or other types of properties**
  - **Political subdivision boundaries**
  - **Township, range, section**

Please see the Land Ownership Mapbook provided in Appendix A for the requested information. There are no tribal properties located within 0.5 miles of the Project Area.

- **Land Use**
  Must include properties within one-half mile of the project boundary.
  - **Land use (e.g., agriculture, recreation) / land cover (e.g. forest, grasslands)**
  - **Zoning within one-half mile of the sites**
  - **Active mines and quarries**
  - **Sensitive sites within one-half mile of the sites (e.g. daycare centers, schools, hospitals, etc.)**
  - **Airports, airstrips (public and private)**

- **Communication towers**
- **Recreation areas and trails**

Please see the following maps provided in Appendix A for the requested information:

- Land Cover Mapbook;
- Zoning Map;
- Land Ownership Mapbook; and
- Airport Map.

No communication infrastructure, active mines, or quarries were identified within 0.5 miles of the Project Area.

- **Utility/Infrastructure Data**
  Must include properties within one-half mile of the project boundary.
  - **Existing transmission, pipelines, and other applicable infrastructure**
  - **Existing distribution lines that would be modified or relocated due to the proposed project**
  - **Roads, highways, interstates**
  - **Railroads**
  - **Applicable infrastructure ROWs (e.g., WisDOT, pipeline, electric distribution, electric transmission, railroad, trail)**

Please see the Project Area Map provided in Appendix A for the requested information.

- **DNR-Required Information**
  Include information such as locations of possible Chapter 30 activities (e.g., grading, riprap), temporary clear span bridges, pole locations and ROW, Wisconsin Wetland Inventory, wetland/waterway field data (correlatable to DNR tables), hydric soils, etc.

Please see the Wetland and Waterway Identification Methods Map and Wetland and Waterway Crossings Aerial Mapbook provided in Appendix A for the requested information.

2.7 GIS Data (see Introduction, page iv.)

Provide GIS data with attributes as listed and described below. GIS attribute table information should be clearly labeled to identify fields and feature names. GIS data should be shapefiles only. Do not provide geodatabases or aerial imagery raster data.

Please see Appendix H for the information requested in Section 2.7. No shapefiles are provided for certain datasets because the relevant features are either not present within the required area of analysis, or because data access is restricted. Additional context is provided below, as appropriate.

2.7.1 Project Area Boundary (polygon).
2.7.2 Proposed and Alternative facilities and footprints (polygon). Include acres.
2.7.3 Proposed and Alternative utility connections (line).

2.7.4 Proposed, Alternative, and/or existing associated facilities. Include interconnection switch yard and/or substation footprint (polygon).
2.7.5 Proposed and Alternative storm water management features (polygon).
2.7.6 Proposed and Alternative access roads (polygon). Include temporary and permanent.
2.7.7 Any necessary new railroads and barge docks (polygon)

No new railroads or barge docks are associated with the Project.

2.7.8 All temporary laydown, material storage areas, and construction parking areas (polygon).

Material storage will occur within designated laydown and construction areas.

2.7.9 Temporary matting (polygon).

Temporary matting locations have not been finalized. Temporary matting will be used as needed in wet areas where ground conditions are unstable to minimize soil disturbance.

2.7.10 Electric distribution lines within one mile of the project area (line). Include voltage of each line and phases present (e.g. A, B, and/or C).

The voltage and phase of all existing distribution lines is currently unknown. Foundry Ridge is an independent power producer, not the local distribution owner; therefore, specific phase and voltage information is not readily available. Typical distribution lines in Wisconsin range from 4 to 35 kV and can be either one or three-phase lines.

2.7.11 Electric transmission lines within one mile of the project area identified by voltage (line). Include voltage.
2.7.12 Natural gas high-pressure pipelines within one mile of the project area (line)

No high-pressure natural gas pipelines are located within one mile of the Project Area.

2.7.13 Delineated wetlands in the project area (polygon). See Section 7.
2.7.14 Field identified waterways in the project area (polygon). See Section 7.

No field delineated waterways are present in the Project Area.

2.7.15 Land cover/Vegetative communities in ROW (polygon). See Section 5.8.
2.7.16 All parcels within one half mile of the project area boundary (polygon). Include landowner name and address.
2.7.17 All residences within one half mile of the project area boundary (point). Include landowner name and address.
2.7.18 All industrial/commercial facilities within one half mile of the project area boundary (point). Include facility name, ownership name, and address.
2.7.19 All sensitive sites, including schools, daycares, hospitals, nursing homes, places of worship, and cemeteries within one half mile of the project area boundary (point). Include facility name, ownership name, and address.
2.7.20 Confined animal operations (point):

- **All confined animal operations within and up to 0.5 miles of the project route centerlines.**
- **For each confined animal operation provide attribute data that identifies the type of animal(s), the number of confined animals, and the name of the landowner.**

No confined animal operations are located within 0.5 miles of the Project Area.

2.7.21 All other buildings within one half mile of the project area boundary (point). Include type of building.

2.7.22 All public lands within one half mile of the project area boundary (polygon).

2.7.23 All properties enrolled in the Conservation Reserve Program within one half mile of the project area boundary (polygon). Information would be dependent on authorization from landowners to release CRP information. Work with PSC staff if any information is considered sensitive and/or confidential.

No properties enrolled in the Conservation Reserve Program were identified within 0.5 miles of the Project Area.

2.7.24 All properties known to be enrolled in a conservation easement within one half mile of the project area boundary (polygon). Include entity that holds rights to conservation easement (e.g. state/federal government, private land trust, etc.).

No properties enrolled in a conservation easement were identified within 0.5 miles of the Project Area.

2.7.25 All communication infrastructure within one half mile of the project area boundary (point). Include radio, television, microwave towers, and any NEXRAD or Doppler weather radar installations.

No communication infrastructure was identified within 0.5 miles of the Project Area.

2.7.26 All public and private airport runways and landing strips within and up to 10 miles of the project area boundary (line). Include facility name and public status.

2.7.27 Local zoning designations within and up to one mile of the project.

3. Project Need Analyses

3.1 Project Need

Describe the purpose/need for the project with supporting data, including an energy efficiency analysis.

3.1.1 Provide the annual peak demand and total energy forecast for the next 20 to 25 years. Provide a description of the demand and energy profile. Any changes in the peak demand and total energy profile over the forecast period should be fully explained.

3.1.2 (Utilities Only) The generation capacity expansion modeling should be performed in a software program like EGEAS or similar software and include a 30-year extension period. Coordinate with PSC[10] to electronically submit the generation capacity

expansion modeling data set(s). In addition to filing the generation capacity expansion modeling data set(s), a document describing the filing and making any necessary request for confidential treatment should be filed on the Commission's ERF system.

3.1.3 Describe the 25-year optimal generation expansion plan for all of the entities that are part of the generation plan.

3.1.4 If discussing the impact of the project on the wholesale market, the modeling should be done using PROMOD or similar software.

3.1.5 Describe how the availability of purchase power was analyzed. Describe how market purchases were analyzed and why they were rejected as alternatives.

3.1.6 Identify plant retirements forecast over the next 10 years.

3.1.7 Provide Attachment Y and Y-2 retirement or economic suspension studies performed by MISO.

3.1.8 Provide the capacity position and planning reserve margin forecast for the next 10 years.

3.1.9 Describe how the existing and expected applications for generation from Independent Power Producers (IPPs) have been factored into your forecast.

3.1.10 Conduct an energy efficiency analysis. The analysis should include:

3.1.10.1 A description of the existing services available to customers, including any demand response programs or voluntary energy efficiency programs operated by the utility;

3.1.10.2 An indication of the amount of additional energy efficiency and demand response needed to reduce, alter, or eliminate the need for the project. This analysis should clearly identify and distinguish the amount of energy efficiency and demand response assumed to be achieved through Focus on Energy and utility programs from the additional energy efficiency and demand response needed to affect the project.

3.1.10.3 An analysis identifying the feasibility of achieving the amount of energy efficiency and demand response needed to reduce, alter, or eliminate the need for the project. This analysis should take into account.

- **A clear definition of the energy efficiency and demand response programming options considered by the utility, and the potential savings, defined as the reduction in energy and capacity associated with the programs, that are available through those options;**
- **The cost-effectiveness of available energy efficiency and demand response options, relative to the costs per unit of the proposed project;**
- **The total savings required to reduce, alter, or eliminate the need for the project, and the corresponding financial investment required to achieve those savings; and**
- **The utility's ability to implement new or expanded programs to achieve available savings.**

3.1.10.4 Describe how energy efficiency or demand response have been incorporated into the expansion planning model, distinguishing between modeled as included in the load forecasts or as a selectable alternative.

3.1.10.5 Provide an integrated analysis with the generation expansion planning modeling conducted under Section 2.1.1. It may be appropriate for analysis to address multiple different scenarios that distinguish between options for reducing, altering, and eliminating the project need.

The Project is a wholesale merchant plant as defined in Wis. Stat. § 196.491(1)(w)1; therefore, in accordance with PSC 111.53(2)(a), this information need not be provided.

3.2 Discuss Energy Alternatives

3.2.1 Describe supply alternatives to this proposal that were considered.

The Project is a wholesale merchant plant as defined in Wis. Stat. § 196.491(1)(w)1; therefore, in accordance with PSC 111.53(2)(a), this information need not be provided.

3.2.2 Present the justification for choosing the proposed options.

Natural gas electric generation was selected for the Facility for several reasons. First, the rapid ramp rates and dispatchable nature of the Facility will enhance the resiliency of the transmission system, supporting the integration of more intermittent resources such as renewable energy. Resiliency refers to the ability to keep power on during all hours, reduce the risk of outages, and withstand or recover quickly from disruptions, and is critical as the transmission system faces increasingly frequent extreme weather events and periods of prolonged stress.

Unlike renewable or battery energy storage resources, natural gas electric generation provides resilience benefits that are not currently matched by inverter-based technologies. They offer operational flexibility and grid-stabilizing characteristics that support reliable electricity delivery during periods of peak demand, emergency conditions, or when intermittent resources are unavailable. Natural gas electric generation supplies inertia, a mechanical property inherent to traditional generators. Inertia is the kinetic energy stored in the rotating mass of an online generator. It acts instantly and automatically to dampen frequency swings following sudden disruptions, such as the unexpected loss of a generation facility or transmission line. This instantaneous response is critical to prevent cascading failures and widespread blackouts.

By providing inertia and ensuring a rapid, stable response to grid fluctuations, natural gas electric generation plays an important role in ensuring the grid can withstand and recover from disruptions, thereby protecting the reliability and safety of electricity supply across the region.

MISO produces a periodic Regional Resource Assessment which in part sets out the accreditation value of different electricity-generating resources. “Accreditation refers to how MISO calculates and assigns capacity values to resources reflecting their contributions to grid reliability when the system is most at risk, considering limiting factors such as their forced outage rates, maintenance, and resource availability.”[3] Under MISO’s new Direct Loss of Load

[3] MISO, 2024, Regional Resource Assessment, p. 5. Available at: https://cdn.misoenergy.org/2024%20RRA%20Report_Final676241.pdf

accreditation methodology, "thermal resources will continue to provide the bulk of the region's accredited capacity."[4]

Significant load sources, including data centers and artificial intelligence processing facilities, are anticipated to come online in the southeastern portion of the state exceeding the generation and transmission capabilities of existing assets. As Wisconsin Electric Company sets out in its application to implement new Very Large Customer and Bespoke Resources Tariffs, (*See* PSC Docket No. 6630-TE-113): "Substantial economic development and investment is being made in southeastern Wisconsin, including by large data center customers. As a result of these investments, electric demand in Wisconsin Electric's service territory is expected to grow dramatically."[5]

The Facility is consistent with utility development plans such as WEC Energy Group's Generation Reshaping Plan[6] and the Very Large Customer and Bespoke Resources Tariff filing.

3.2.3 If the project is not a cogeneration project, explain why it is not.

Foundry Ridge selected a simple-cycle design to align with the anticipated operational profile of the Facility. The Facility is anticipated to primarily operate during periods of peak electrical demand as a capacity-based Facility and thus is not designed for steam or excess heat production.

3.2.4 Discuss a no-build alternative and its potential impact on electrical supply and environmental impact.

3.2.5 Summarize the analysis on load reduction (conservation and energy efficiency) as an alternative (Wis. Admin. Code § PSC 111.53(1)(d)1.).

3.2.6 Provide analyses that examines the proposed project's cost-effectiveness, technical feasibility and environmental soundness in meeting the energy demand with respect to the following energy priorities (Wis. Stat. §§ 1.12(4) and 196.025(1)(ar)):

3.2.7 Noncombustible renewable energy resources.

3.2.8 Advanced nuclear energy using a reactor design or amended reactor design approved after December 31, 2010, by the U.S. Nuclear Regulatory Commission.

3.2.9 Combustible renewable energy resources.

3.2.10 Nonrenewable combustible energy resources in the following order listed:

- **Natural gas**
- **Oil or coal with sulfur content of less than one percent**
- **All other carbon-based fuels.**

The Project is a wholesale merchant plant as defined in Wis. Stat. § 196.491(1)(w)1; therefore, in accordance with PSC 111.53(2)(a), this information need not be provided. Further, it is not technically feasible for Foundry Ridge to offer an energy conservation and efficiency program as an alternative to the Project.

[4] Id.
[5] Application, Very Large Customer and Bespoke Tariff, pg. 1 (Mar. 31, 2025; Dt. 6630-TE-112).
[6] https://www.wecenergygroup.com/home/generation-reshaping-plan.htm

3.3 Wholesale Market Competition

Describe the potential effect of the proposed project on wholesale market competition. Provide an analysis of the Herfindahl-Hirschman Index market concentration impact of the proposed project. Discuss whether the cost of energy from the proposed plant would lower or increase the cost of energy and if so, how. Also discuss what the impact of the additional generation would have on the price of energy.

The Project will interconnect and operate within the wholesale electricity market administered by MISO. MISO commits and dispatches generation to serve load on an unbiased, least-cost basis through a centrally dispatched security-constrained energy market. Offers from generation owners and bids from load serving entities within MISO's energy market are closely monitored by an independent market monitor ("IMM") who is responsible for the identification and mitigation of market power abuses. Module D of the MISO Tariff contains the Market Monitoring and Mitigation Measures used by the IMM to provide fair, equitable, and non-discriminatory access to the MISO energy market. The Market Monitoring and Mitigation Measures provide the means for MISO to mitigate the market effects of any conduct that may distort competitive outcomes in the markets and services administered by MISO. Therefore, Foundry Ridge will be restricted from raising prices above market levels.

The Project will interconnect to the transmission system owned by ATC. Fair and equitable access to ATC's transmission system is provided through the MISO Tariff and subject to the functional control of MISO. The Project will operate under the functional supervision of MISO and the IMM through the open-access and energy market provisions of the MISO Tariff.

Leidos Engineering, LLC prepared a Market Power Screen Analysis (Appendix I) assessing the Herfindahl-Hirschman Index market concentration impact of the Project. The Market Power Screen Analysis confirmed that the Project will not have a material adverse impact on competition in the relevant electric wholesale market. Furthermore, the analysis indicates that the Project will reduce concentration and increase competition.

Foundry Ridge anticipates that the Project will lower the cost of energy by quickly adding capacity during periods of peak electrical demand thereby reducing costly market and transmission congestion.

3.4 Excess Heat or Steam Energy

Identify uses for excess heat or steam energy from the project, including any potential for secondary industrial or commercial development. Include both the long-term potential as well as any short-term plans for future steam customers.

The Facility will not produce excess heat or steam which could be collected for secondary use.

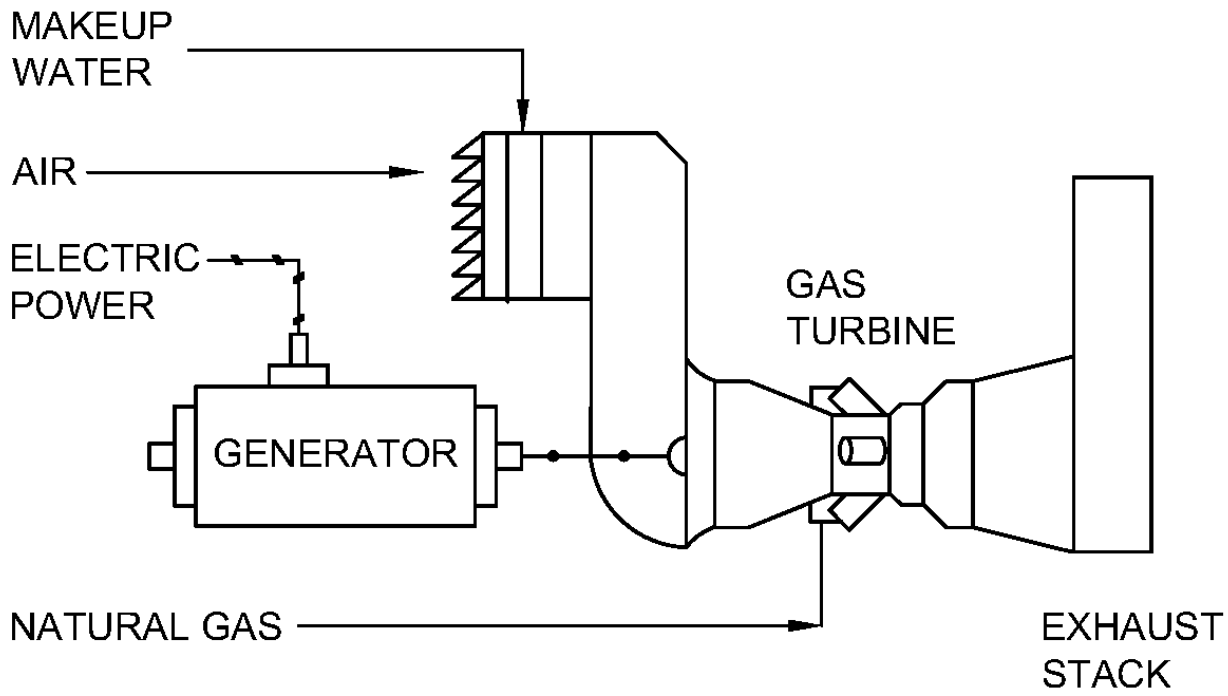
4. Project Engineering

4.1 Facilities

4.1.1 Describe the power plant proposed (technology and major components required). Support with diagrams, drawings, and simulations, as necessary. Describe separately and to the same detail any and all supporting facilities related to fuel delivery and unloading, conveyors, crushers and processors, cooling water systems, water intake and filtering, water discharge, ash loading, and air pollution control.

The Facility will include three GE 7E.03 gas turbines and A35 air-cooled generators. Each generator will have an individual capacity of 108 MW and an aggregate capacity of 324 MW. The Facility will be fueled by natural gas and will not include backup fuel capability. Figure 1 provides a general diagram of the overall generating process.

Figure 1 Overall Generating Process



Gas Turbine Generators

Each GTG will consist of an E-class gas turbine coupled to an A35 generator driven at 3,600 revolutions per minute ("rpm"). Technical datasheets for the gas turbines and generators are provided in Appendix C. Ambient air will be drawn into the compressor section of the gas turbine, passing through an inlet filter and evaporative cooler. During warm weather, the evaporative coolers will increase the density of inlet air, which will enhance the electrical generating capacity of the gas turbines. Heat from turbine bleed will warm inlet air and prevent icing during cold weather. The compressor section of the gas turbine will compress the inlet air and convey it to the combustion section. There, fuel will be introduced and combustion will occur. Dry ultra-low nitrogen oxide ("NO_x") combustors will minimize NO_x formation while

firing natural gas. The expansion of the combustion products will actuate a multi-stage power turbine, producing the energy that drives the compressor and the generator. Exhaust gas will pass through a silencer and exhaust stack.

The main features of each gas turbine are:

- Single fuel (natural gas);
- Dry low-NO_x combustors (DLN-1.0+);
- Inlet air filtration;
- Inlet air evaporative cooling;
- Exhaust stack with emission compliance systems;
- Advanced turbine and combustion control systems; and
- Fire protection system.

The main features of each generator are:

- Synchronous, three-phase, 60 Hertz ("Hz");
- 110 megavolt-amperes ("MVA") capacity;
- Two-pole field (3,600 rpm);
- Enhanced vibration monitoring system;
- Totally enclosed water-to-air cooled rotor and stator; and
- 13.8 kV Output voltage.

Facility Electrical Systems

Each generator will have an output of 13.8 kV and connect to a GSU transformer. The GSU transformers will step up the voltage to 138 kV to match the transmission system at the point of interconnection. Each generator will have its own 13.8 kV circuit breaker to protect and isolate the generator during maintenance or fault conditions. An auxiliary power supply system will distribute electricity at lower voltages to auxiliary equipment, including pumps, fans, and control systems. Weather-resistant enclosures will enhance long-term reliability by shielding electrical equipment from environmental elements.

Emergency Backup Generator and Firewater Pump

The Facility will include an emergency backup generator, which in the event of a loss of primary power supply, will provide auto-start and backup power to essential systems. The emergency backup generator will utilize natural gas as fuel. Should there be primary power loss, or for testing purposes, an emergency firewater pump will supply water using an electric motor. A separate dedicated electrical feed will connect the emergency backup generator to the emergency firewater pump.

Fuel Supply System

The Facility will be fueled by pipeline-quality natural gas and will not include backup fuel capability. Conditioning equipment will be installed to protect the system and maintain fuel requirements for the Facility. The conditioning equipment will include regulation trains, duplex filter separators, dew point heaters, coalescing filters, a final pressure control skid, and final coalescing filters. Overpressure protection will safeguard the system and duplex filter separators

will enhance filtration efficiency. The dew point heater will regulate fuel temperature and prevent condensation. The final pressure control skid will provide stable pressure regulation and final coalescing filters will ensure high fuel purity. A gas chromatograph will be utilized to monitor supply at the gate station. Additional gas storage and compression is not expected to be required.

Foundry Ridge expects to negotiate a Gas Supply Agreement with WE-GO to supply natural gas to the Facility. WE-GO will construct, own, and operate a natural gas pipeline lateral to connect the Facility to the Guardian pipeline. Foundry Ridge expects the natural gas pipeline lateral to be located in the Town of Darien, Walworth County, Wisconsin. Preliminary routing for the natural gas pipeline lateral from WE-GO is not currently available. WE-GO will be responsible for all activities required for the planning, construction, and operation of the natural gas pipeline lateral and associated metering and interconnection facilities, including studies, evaluations, permits, and regulatory notifications.

Closed Cycle Cooling Water System

The closed cycle cooling water ("CCCW") system will consist of air-cooled heat exchangers, pumps, an expansion head tank, and a chemical feeder for each gas turbine. The CCCW system will circulate a propylene glycol/water mixture with a corrosive inhibitor to supply cooling water to equipment and reject waste heat to the atmosphere. A CCCW system is a highly reliable system and with proper maintenance, should provide trouble-free operation for the life of the gas turbine.

Compressed Air System

The Facility's compressed air system will consist of compressors, inlet filters, after cooler, pressure dampening, air receiver tanks, controls, automatic condensate traps, valves, air-dryers, piping, storage tanks, and protection devices. The compressed air system will be sized according to the total capacity, pressure, and quality requirements for the Facility. Compressed air will be used for instrumentation, controls, and service air systems. Compressors automatically control motor starting and capacity output to maintain adequate system pressure and avoid overloading the power system. Compressed air systems are reliable, relatively simple, and safe in hazardous environments.

Exhaust and Emissions Control System

The exhaust and emissions control system will ensure compliance with regulatory air emission limits. Foundry Ridge will implement the best available control technology ("BACT"), which includes the following:

- *Ultra-Low NO_x Combustors*

  The gas turbines will be equipped with dry ultra-low NO_x combustors to minimize the formation of nitrogen oxides.

- *Continuous Emissions Monitoring System ("CEMS")*

  The CEMS will continuously monitor and record emissions of NO_x, Carbon Monoxide ("CO"), and other regulated pollutants.

- *Carbon Monoxide and Volatile Organic Compound ("VOC") Emissions Control*

Advanced combustion controls and optimization strategies will be employed to minimize incomplete combustion, thereby reducing CO and VOC emissions.

- *Startup and Shutdown Procedures*

  Specific operating procedures will be implemented during startup and shutdown to minimize transient emissions of NO_x, CO, and other pollutants.

Stack height and diameter will be design inputs for air dispersion modeling and testing requirements.

Lubricating Oil System

The lubricating oil system will circulate oil to control and lubricate bearings and other GTG components. The lubricating oil system will consist of lubrication oil pumps (dual redundant AC moto-driven), hydraulic pumps (dual redundant AC motor-driven variable displacement pumps), filters, coolers (stainless steel plate/frame oil-to-coolant heat exchanger), mist elimination, oil reservoirs, piping, instrumentation, and control systems. Each GTG will include its own accessory module that houses a lubrication oil reservoir and pumping system. The lubrication oil reservoir will be located in a containment area for spill prevention.

Water Wash System

A water wash system will maintain performance by periodically cleaning the gas turbine compressor blades. The water wash system will consist of a water storage tank, detergent storage tank, pumps, piping, instrumentation, and controls.

Water Supply System

Service water and demineralized water will be required to operate and maintain the Facility. Water will be supplied to the Facility by a new on-site well. The water supply system will include redundant pump, storage capacity, instrumentation, and control to ensure operational reliability. The Facility will include an approximately 700,000-gallon service water storage tank, 400,000-gallon demineralized water storage tank, and 2,000-gallon potable water storage tank.

The service water system will distribute low-pressure water throughout the Facility for the following uses:

- Hose stations for maintenance washdown;
- Demineralized water treatment system;
- Gas turbine evaporative cooling system makeup;
- Fire protection system supply; and
- Domestic water for lavatories and other uses.

The water supply system will be efficiently designed to minimize wastewater. To generate demineralized high purity water, the Facility will implement advanced water treatment technologies, such as ion exchange, reverse osmosis, and electrodialysis. The water supply system design will include back-flow prevention devices to separate the process users from the potable users.

The Facility is estimated to use up to approximately 55 gallons per minute ("gpm") of water (up to 79,200 gallons per day) at maximum load. Of this, approximately 51 gpm may be used for gas turbine evaporative cooling which will only occur when ambient temperatures exceed 59ºF. Evaporative cooling water will recycle approximately five cycles of concentration and once water conductivity increases, the water will blowdown into either the wastewater storage tank or stormwater management system at a rate of approximately 10 gpm (up to 14,400 gallons per day) for storage and offsite removal. The remaining approximately 4 gpm will be used for Facility lavatory and other miscellaneous uses. The Facility will be designed to minimize wastewater and maximize efficiency of demineralized water production and usage. Preliminary water balance diagrams for the Facility identifying inflows, reuse pathways, effluent losses, and outfall pathways are provided in Appendix J.

Wastewater Disposal System

The wastewater disposal system will be designed to comply with all applicable federal, state, and local regulations, and will provide separate handling for sanitary, process wastewater, and stormwater streams. Any wastewater deemed hazardous will be handled and disposed of in accordance with WDNR permits and all other applicable regulations.

Sanitary wastewater generated at the Facility will be treated through an on-site septic system designed to meet the operational needs of the Facility.

Process wastewater from demineralization of service water and evaporative cooler blowdown will be collected in a wastewater storage tank (approximately 40,000 gallons). The Facility will be designed to recycle wastewater streams where feasible, resulting in a maximum wastewater discharge of approximately 12 gpm (up to 17,800 gallons per day). The majority of this discharge, approximately 10 gpm, originates from evaporative cooler blowdown, which primarily occurs during summer months when ambient temperatures exceed 59ºF. Each gas turbine will be equipped with an individual wash drain storage tank to collect wastewater. These tanks will be installed in an underground containment. Drain tanks will be periodically emptied. The contents within the wastewater storage tank will be hauled off site for treatment or disposed of using existing onsite treatment systems. Non-contact cooling water (evaporative cooling blowdown) may be discharged under the NPDES industrial stormwater program, contingent on compliance with WPDES effluent discharge standards.

Oil containments and Facility drains will be discharged to an oily-water separator, which consists of a double-walled, leak-monitored underground storage tank. The oily-water separator will be approximately five feet in diameter and 14 feet long. The oily-water-separator-cleaned effluent will be discharged to a stormwater retention pond. Oily-water separator tank contents are expected to be removed from site, on average, once every 6 months.

The stormwater runoff management system will collect and discharge stormwater from the Facility into a stormwater retention pond where it will be discharged to groundwater. Any leaked oil will be separated from contact stormwater prior to discharge to the stormwater retention pond. A SWPPP will be developed and implemented in accordance with federal, state, and local regulations to minimize sediment and pollutant discharge from the site during construction and operation.

Fire Protection System

The design for the Facility's fire protection system and its constituent features will be based on recommendations from the National Fire Protection Association ("NFPA") 850, "Recommended Practice for Fire Protection for Electric Generating Plants and High Voltage Direct Current Converter Stations," NFPA 37, "Installation and Use of Stationary Combustion Engines and Gas Turbines," NFPA 54, "National Fuel Gas Code," NFPA 70, "National Electrical Code," NFPA 110, "Emergency and Standby Power Systems" and their referenced standards.

To ensure adequate flow and pressure during emergencies, firewater will be drawn from a combined firewater and service water storage tank and through a dedicated suction line connected to the emergency firewater pump. The main fire header will loop around the power block to supply main branch lines to buildings, auxiliary structures, enclosures, yard fire hydrants, and wet suppression systems. Yard fire hydrants will be located no more than 300 feet from each other, in accordance with NFPA 850. Portable fire extinguishers will be located throughout the Facility in accordance with NFPA 10.

The principal fire protection panel will be located in the central control room, with alarm annunciation throughout the entire Facility. The main panel will be connected to local fire control panels located throughout the Facility.

Facility Buildings

The Facility will include buildings essential for the safe and reliable operation and maintenance of equipment. The Facility buildings include:

- Control, administration, and warehouse/maintenance building;
- Water treatment building;
- Miscellaneous buildings, including, but not limited to, the firewater pump enclosure, substation control enclosure, and electrical equipment enclosures.

For the protection of personnel and sensitive equipment, buildings will include appropriate fire protection, heating, ventilation, air conditioning systems, and physical security. All building design will follow applicable regulations. The Project will be designed and constructed to allow for safe control, operation, and monitoring from the central control room and remotely. Sequence and modulating control systems will be fully automated but manual operation will be possible. A preliminary design schematic for the control, administration, and warehouse/maintenance building is provided in Appendix A.

4.1.2 Describe the proposed additions, possible expansions or other modifications that have been evaluated for the future. Describe the purpose for each. Support with similar graphics to those of Section 3.1.1.

No additions, expansions, or other modifications are planned at this time.

The gas turbines can fire up to 5% hydrogen by volume in their standard configuration. However, the Facility design does not include the fuel blending equipment to support firing of hydrogen. Potential upgrades for hydrogen firing (up to 30% by volume) would likely require modifications including:

- Upgraded materials for hydrogen service;
- Enhanced hazardous gas and fire detection systems, with enclosure ventilation improvements;
- Modified gas valve modules incorporating inert purge systems;
- Additional Combustion Dynamics Monitoring sensors;
- Integration of an hydrogen control module;
- Addition of a static mixer; and
- Gas speciation sensors.

4.1.3 Estimate the expected hours of operation and capacity on a daily, weekly, seasonal, and annual basis. (Wis. Admin. § PSC 111.53(1)(a)(3)).

Except for planned outages, the Facility will be available to operate 24 hours a day, seven days a week, 365 days a year. Although the Facility will be designed for continuous service, Foundry Ridge anticipates it will primarily operate during periods of peak electrical demand. MISO defines "On Peak" as the "Period of time between Hour-ending 0700 EST through and including Hour-ending 2200 Hours EST Monday through Friday excepting New Year's, Memorial Day, Fourth of July, Labor Day, Thanksgiving Day, and Christmas Day or if the holiday occurs on a Sunday, the Monday immediately following the holiday."

When exactly the Facility will be in operation depends on several variable factors. Chief among them is demand. Power demand is typically highest during the week—when all industry is in operation—and during the temperature extremes of summer and winter, particularly in the early morning and evening.

The Facility and each GTG are expected to have annual gross and net capacity factors of approximately 20%, with monthly and seasonal variations. Daily and weekly capacity factors may be as high as 100%. In accordance with the Title V Operating Permit, the Facility will have a 12-month rolling fuel based operating limit equivalent to 2,338 hours per GTG operating at 100% load (equivalent to a 27% capacity factor). The fuel-based limit will enable the Facility flexibility to operate more than 2,338 hours per 12-month rolling period when the GTGs are not operating at 100% load. Several drivers will affect the capacity factors including fuel pricing, temporary transmission constraints, efficiency of the Facility, maintenance requirements, power demand, and competing generation resource availability, capacity, and efficiency.

4.1.4 Provide an estimated duration and frequency of maintenance outages projected for the proposed project on an annual basis, and the amount of expected energy not produced during such outages.

Major maintenance will be completed in general conformance with the baseline inspection, repair, and replacement intervals set forth by the original equipment manufacturer ("OEM"). Assuming a starts-based operating profile, the periodic major maintenance events for each gas turbine are anticipated to be scheduled in general conformance with the following OEM-recommended baseline inspection intervals: (i) 1,200 factored fired starts between hot gas path inspections (which are inclusive of combustion inspections) and (ii) 2,400 factored fired starts between major inspections. Service intervals may be adjusted based on prior operating experience, engineering judgement, and subsequent revision(s) to the applicable OEM maintenance interval guidance. Based on the anticipated operating profile for the Facility, hot

gas path inspections will occur approximately every four years and the major inspections will occur approximately every eight years.

Gas turbine major maintenance events are estimated to take 15 days for a hot gas path inspection and 30 days for a major inspection (assuming single-shift staffing levels). Duration may vary with planned or emergent work scope. Double-shift staffing may reduce the duration by approximately 50%.

Gas turbine maintenance represents the preponderance of potential long-duration outage requirements. Unless arising from unique, Project-specific work activities, planned maintenance of generators and balance-of-plant ("BOP") equipment is expected to either coincide with planned gas turbine major maintenance events or occur during shorter-duration, routine annual unit outages.

Because each gas turbine serves in an anticipated "peaking" duty cycle, potential long-duration outage requirements may not necessarily detract from the Project's capacity factors or lead to unrealized energy production.

4.1.5 Provide the facilities' physical dimensions and expected appearance.

4.1.6 Provide detailed scale drawings and/or simulations of all the Proposed and Alternative plant facilities for the sites and their footprints.

4.1.7 Photo simulations are desirable. (In order to be certain that any photo simulations provided in an application will be useful, please consult with PSC staff before preparing and submitting photos.).

The permanent footprint of the Proposed Site is approximately 16 acres. The permanent footprint of the Alternative Site is approximately 15 acres. Please see the Proposed and Alternative Site General Arrangement Schematics and Equipment Layout Schematics provided in Appendix A for detailed design information. Photo simulations of the Proposed and Alternative Sites and Gen-Tie Lines are provided in Appendix K. Agency correspondence regarding the photo simulations is provided in Appendix F. An interactive web viewer corresponding to the photo simulations can be viewed at: https://foundry-ridge.truescape.com/.

4.1.8 Provide the expected operating characteristics for the project.

4.1.8.1 Heat rate

Table 7 provides the estimated heat rates when firing natural gas based on the design average ambient air conditions (59°F, 60% relative humidity).

Table 7 Heat Rates

Operating Mode at Annual Average Ambient Conditions	Gross Facility Heat Rate Higher Heating Value (Btu/kWh)	Gross Output (MW)
One GTG	10,970	108
Two GTGs	10,970	216
Three GTGs	10,970	324

4.1.8.2 Equivalent availability and capacity factors on a seasonal basis

Based on operation data obtained from existing natural gas turbine electric generating facilities in the U.S. reporting to the Generation Availability Data System in the year 2024, the Equivalent Availability Factor for E-class GTG facilities operating in simple cycle is approximately 96% with approximately 1% Equivalent Forced Outage Factor and approximately 2% Equivalent Unforced Outage Factor.

The Facility and each GTG are expected to have annual gross and net capacity factors of approximately 20%, with monthly and seasonal variations. Daily and weekly capacity factors may be as high as 100%. In accordance with the Title V Operating Permit, the Facility will have a 12-month rolling fuel based operating limit equivalent to 2,338 hours per GTG operating at 100% load (equivalent to a 27% capacity factor). The fuel-based limit will enable the Facility flexibility to operate more than 2,338 hours per 12-month rolling period when the GTGs are not operating at 100% load. Several drivers will affect the capacity factors including fuel pricing, temporary transmission constraints, efficiency of the Facility, maintenance requirements, power demand, and competing generation resource availability, capacity, and efficiency.

4.1.8.3 Auxiliary power usage

When firing natural gas in design average ambient conditions, the estimated auxiliary power for the GE 7E.03 is approximately 600 kilowatts ("kW") per GTG. Auxiliary loads include cooling water pumps and fans, lube oil pumps, heating, ventilation, and air conditioning equipment, battery charges, air compressors, and miscellaneous electrical panels.

4.1.8.4 Provide heat balances for the following operating modes:
4.1.8.5 Half load operation

Table 8 provides heat balances for 75% load operation. Data provided in Table 9 captures 50% load operation.

Table 8 Half Load Operation Heat Balance

Parameter	Units	Case 6	Case 9	Case 12	Case 15	Case 18	Case 21	Case 24	Case 27
Case Comments									
Load Condition	%	75%	75%	75%	75%	75%	75%	75%	75%
Inlet Loss	in H_2O	2.04	2.02	1.94	1.82	1.7	1.68	1.72	1.72
Exhaust Pressure Loss	in H_2O	6.01	5.92	5.44	4.79	4.25	4.12	4.38	4.36
Ambient Temperature	deg F	-10	0	25	59	90	100	90	100
Ambient RH	%	40	40	95	60	60	40	60	40
Evap. Cooler Status		Off	Off	Off	Off	Off	Off	On	On
Evap. Cooler Effect	%	0	0	0	0	0	0	90	90
Fuel Type		Gas	Gas	Gas	Gas	Gas	Gas	Gas	Gas
Fuel LHV	BTU/lb	20,703	20,703	20,703	20,703	20,703	20,703	20,703	20,703

Parameter	Units	Case 6	Case 9	Case 12	Case 15	Case 18	Case 21	Case 24	Case 27
Fuel Temperature	deg F	80	80	80	80	80	80	80	80
Output	kW	77,744	77,118	72,071	64,617	57,464	55,099	59,991	59,643
Heat Rate (LHV)	BTU/kWh	10,593	10,565	10,749	11,129	11,584	11,718	11,455	11,472
Heat Cons. (LHV)	MMBTU/hr	823.6	814.8	774.7	719.1	665.7	645.6	687.2	684.2
Auxiliary Losses	kW	600	600	600	600	600	600	600	600
Output - Net	kW	77,144	76,518	71,471	64,017	56,864	54,499	59,391	59,043
Heat Rate (LHV) - Net	BTU/kWh	10,676	10,648	10,840	11,233	11,706	11,847	11,570	11,589
Exhaust Flow	x10^3 lb/hr	2009	1992	1902	1774	1664	1640	1690	1686
Exhaust Temperature	deg F	1014	1018	1042	1079	1100	1100	1100	1100
Exhaust Molar Wght	lb/lbmol	28.55	28.55	28.51	28.45	28.25	28.29	28.21	28.21
Exhaust Energy	MMBTU/hr	533.2	526.5	504.2	475	446.9	435.3	454.9	449.6
Emissions Results									
NO_x	ppmvd	5	5	5	5	5	5	5	5
NO_x AS NO_2	lb/hr	16	16	15	14	13	13	14	14
CO	ppmvd	25	25	25	25	25	25	25	25
CO	lb/hr	49	46	43	40	37	37	38	38

4.1.8.6 Minimum load operation

Table 9 provides the heat balances for minimum load operation.

Table 9 Minimum Load Operation Heat Balance

Parameter	Units	Case 7	Case 10	Case 13	Case 16	Case 19	Case 22	Case 25	Case 28
Case Comments		MECL	MECL	MECL	MECL	MECL	MECL	MECL	MECL
Load Condition	%	43%	36%	37%	38%	48%	49%	48%	49%
Inlet Loss	in H_2O	1.31	1.15	1.17	1.18	1.33	1.33	1.33	1.34
Exhaust Pressure Loss	in H_2O	3.53	3.05	2.94	2.79	3.02	2.99	3.08	3.12
Ambient Temperature	deg F	-10	0	25	59	90	100	90	100
Ambient RH	%	40	40	95	60	60	40	60	10
Evap. Cooler Status		Off	Off	Off	Off	Off	Off	On	On
Evap. Cooler Effect	%	0	0	0	0	0	0	90	90
Fuel Type		Gas	Gas	Gas	Gas	Gas	Gas	Gas	Gas

Parameter	Units	Case 7	Case 10	Case 13	Case 16	Case 19	Case 22	Case 25	Case 28
Fuel LHV	BTU/lb	20,703	20,703	20,703	20,703	20,703	20,703	20,703	20,703
Fuel Temperature	deg F	80	80	80	80	80	80	80	80
Output	kW	44,573	37,017	35,555	32,739	36,777	35,998	38,394	38,967
Heat Rate (LHV)	BTU/kWh	13,704	15,036	15,066	15,440	14,346	14,423	14,119	14,001
Heat Cons. (LHV)	MMBTU/hr	610.8	556.6	535.7	505.5	527.6	519.2	542.1	545.6
Auxiliary Losses	kW	600	600	600	600	600	600	600	600
Output - Net	kW	43,973	36,417	34,955	32,139	36,177	35,398	37,794	38,367
Heat Rate (LHV) - Net	BTU/kWh	13,891	15,284	15,325	15,729	14,584	14,668	14,343	14,220
Exhaust Flow	x10^3 lb/hr	1521	1411	1384	1350	1403	1397	1418	1426
Exhaust Temperature	deg F	1082	1100	1100	1100	1100	1100	1100	1100
Exhaust Molar Wght	lb/lbmol	28.56	28.57	28.54	28.48	28.28	28.32	28.24	28.24
Exhaust Energy	MMBTU/hr	432.2	404.1	388.3	367.9	375.5	369.9	380.6	379
Emissions Results									
NO_x	ppmvd	5	5	5	5	5	5	5	5
NO_x AS NO_2	lb/hr	12.6	11.5	11.0	10.4	10.9	10.7	11.2	11.3
CO	ppmvd	25	25	25	25	25	25	25	25
CO	lb/hr	36.6	34.0	33.3	32.4	33.3	33.3	33.5	33.7

4.1.8.7 Rated load operation

4.1.8.8 Maximum capacity operation

Table 10 provides the heat balance for rated load and maximum capacity operation.

Table 10 Rated/Maximum Load Operation Heat Balance

Parameter	Units	Case 5	Case 8	Case 11	Case 14	Case 17	Case 20	Case 23	Case 26
Case Comments									
Load Condition	%	BASE	BASE	BASE	BASE	BASE	BASE	BASE	BASE
Inlet Loss	in H_2O	3.26	3.21	3.04	2.8	2.54	2.47	2.61	2.6
Exhaust Pressure Loss	in H_2O	9.75	9.59	8.66	7.51	6.48	6.2	6.78	6.74
Ambient Temperature	deg F	-10	0	25	59	90	100	90	100
Ambient RH	%	40	40	95	60	60	40	60	40
Evap. Cooler Status		Off	Off	Off	Off	Off	Off	On	On

Parameter	Units	Case 5	Case 8	Case 11	Case 14	Case 17	Case 20	Case 23	Case 26
Evap. Cooler Effect	%	0	0	0	0	0	0	90	90
Fuel Type		Gas	Gas	Gas	Gas	Gas	Gas	Gas	Gas
Fuel LHV	BTU/lb	20,703	20,703	20,703	20,703	20,703	20,703	20,703	20,703
Fuel Temperature	deg F	80	80	80	80	80	80	80	80
Output	kW	103,659	102,825	96,094	86,156	76,619	73,466	79,988	79,524
Heat Rate (LHV)	BTU/kWh	9,929	9,889	9,970	10,186	10,504	10,606	10,407	10,421
Heat Cons. (LHV)	MMBTU/hr	1,029.20	1,016.80	958.1	877.5	804.8	779.2	832.4	828.7
Auxiliary Losses	kW	600	600	600	600	600	600	600	600
Output - Net	kW	103,059	102,225	95,494	85,556	76,019	72,865	79,388	78,924
Heat Rate (LHV) - Net	BTU/kWh	9,987	9,947	10,033	10,257	10,586	10,694	10,486	10,500
Exhaust Flow	x10^3 lb/hr	2577	2554	2420	2243	2076	2029	2125	2118
Exhaust Temperature	deg F	973	976	995	1020	1044	1050	1038	1039
Exhaust Molar Wght	lb/lbmol	28.55	28.55	28.52	28.46	28.26	28.29	28.22	28.22
Exhaust Energy	MMBTU/hr	654.5	644.8	609.5	563.5	524	509.5	534.2	527.6
Emissions Results									
NO_x	ppmvd	5	5	5	5	5	5	5	5
NO_x AS NO_2	lb/hr	21	20	19	18	16	16	17	17
CO	ppmvd	25	25	25	25	25	25	25	25
CO	lb/hr	59	59	55	51	47	46	48	48

4.1.8.9 Describe the proposed project black start capability and necessary minimum requirements, if applicable.

The Facility will not be designed as a MISO black start asset.

4.2 Fuel Supply

Describe the proposed fuel supply (Wis. Adm. Code § PSC 111.53(1)(a)(5)) if the energy is based on the combustion of fuel (*e.g.* coal, natural gas, biomass). Provide the appropriate information under this section for all types of proposed fuels.

4.2.1 Identify and describe the types of proposed primary and backup fuels.

The Facility will be fueled by natural gas and will not include backup fuel capability.

4.2.2 Discuss the likely fuel source(s) and its (their) availability.

The natural gas used by the Facility will be sourced by WE-GO, with gas transportation provided by the Guardian pipeline from the Chicago supply basin, to interconnect with the WE-GO distribution system. WE-GO will construct, own, and operate a natural gas pipeline lateral to connect the Facility to the Guardian pipeline.

4.2.3 Estimate or establish the ranges of each potential fuel's heating value and chemical analysis.

The natural gas used by the Facility will be pipeline-quality and regulated by the WE-GO tariff. Natural gas regulated by this tariff must meet specific heating value and chemical make-up standards. For example:

- Higher heating value may not exceed 1,200 BTU or fall below 967 BTU, per cubic foot of natural gas.
- Natural gas cannot contain more than 20 grains of total sulfur per 100 cubic feet.
- Natural gas cannot contain more than 2 percent carbon dioxide ("CO_2") by volume.

4.2.4 Describe the proposed fuel transport and delivery systems.

The natural gas used by the Facility will be sourced by WE-GO, with gas transportation provided by the Guardian pipeline from the Chicago supply basin, to interconnect with the WE-GO distribution system. WE-GO will construct, own, and operate a natural gas pipeline lateral to connect the Facility to the Guardian pipeline. Foundry Ridge expects the natural gas pipeline lateral to be located in the Town of Darien, Walworth County, Wisconsin. The natural gas pipeline lateral is expected to be approximately 5.3 miles in length for the Proposed Site and approximately 2.5 miles in length for the Alternative Site. The natural gas pipeline lateral is expected to have a diameter of 16 inches. Preliminary routing for the natural gas pipeline lateral from WE-GO is not currently available.

Conditioning equipment will be installed to protect the system and maintain fuel requirements for the Facility. The conditioning equipment will include regulation trains, duplex filter separators, dew point heaters, coalescing filters, a final pressure control skid, and final coalescing filters. Overpressure protection will safeguard the system and duplex filter separators will enhance filtration efficiency. The dew point heater will regulate fuel temperature and prevent condensation. The final pressure control skid will provide stable pressure regulation and final coalescing filters will ensure high fuel purity. A gas chromatograph will be utilized to monitor supply at the gate station. Additional gas storage and compression is not expected to be required.

Foundry Ridge expects to negotiate a Gas Supply Agreement with WE-GO to supply natural gas to the Facility. WE-GO will be responsible for all activities required for the planning, construction, and operation of the natural gas pipeline lateral and associated metering and interconnection facilities, including studies, evaluations, permits, and regulatory notifications.

4.2.5 If the fuel is coal:

4.2.6 Describe the size and types of vehicles that will be used to deliver the coal to the operating plant, including the source locations, off-site storage and processing if applicable, and routes to on-site coal handling facilities.

4.2.7 Describe the process sequence of each type of fuel delivery.

4.2.8 Detail the frequency of anticipated deliveries and the quantities of fuel.

4.2.9 Discuss any modifications of roads, railroads, and any other facilities necessary to handle the delivery of the fuel.

4.2.10 Describe and diagram on-site fuel handling from delivery through storage, conveyance, and end use.

The Facility will not utilize coal as fuel.

4.2.11 If the fuel is natural gas:

4.2.11.1 Identify the pipeline supplier(s).

Foundry Ridge expects to negotiate a Gas Supply Agreement with WE-GO to supply natural gas to the Facility. WE-GO will construct, own, and operate a natural gas pipeline lateral to connect the Facility to the Guardian pipeline owned by Guardian Pipeline L.L.C. The parent company of Guardian Pipeline L.L.C is DT Midstream.

4.2.12 How much of the fuel supply is expected to be:

4.2.12.1 Firm

Foundry Ridge has requested firm natural gas from WE-GO. WE-GO plans to provide firm pipeline capacity to meet the peak day requirement for the Facility. The Facility has a target firm supply of approximately 68,800 MMBtu/day.

4.2.12.2 Secondary Firm

No secondary firm fuel delivery option is expected for the Project.

4.2.12.3 Interruptible.

Interruptible fuel delivery will be utilized when firm service is not available.

4.2.13 Describe the size, lengths, routes, and other characteristics of the proposed natural gas pipeline(s) that would serve the project. (See PSC website for Natural Gas Pipeline Application Filing Requirements.)

WE-GO will construct, own, and operate a natural gas pipeline lateral to connect the Facility to the Guardian pipeline. Foundry Ridge expects the natural gas pipeline lateral to be located in the Town of Darien, Walworth County, Wisconsin. The natural gas pipeline lateral is expected to be approximately 5.3 miles in length for the Proposed Site and approximately 2.5 miles in length for the Alternative Site. The natural gas pipeline lateral is expected to have a diameter of 16 inches. Preliminary routing for the natural gas pipeline lateral from WE-GO is not currently available. WE-GO will be responsible for all activities required for the planning, construction, and operation of the natural gas pipeline lateral and associated metering and interconnection facilities, including studies, evaluations, permits, and regulatory notifications.

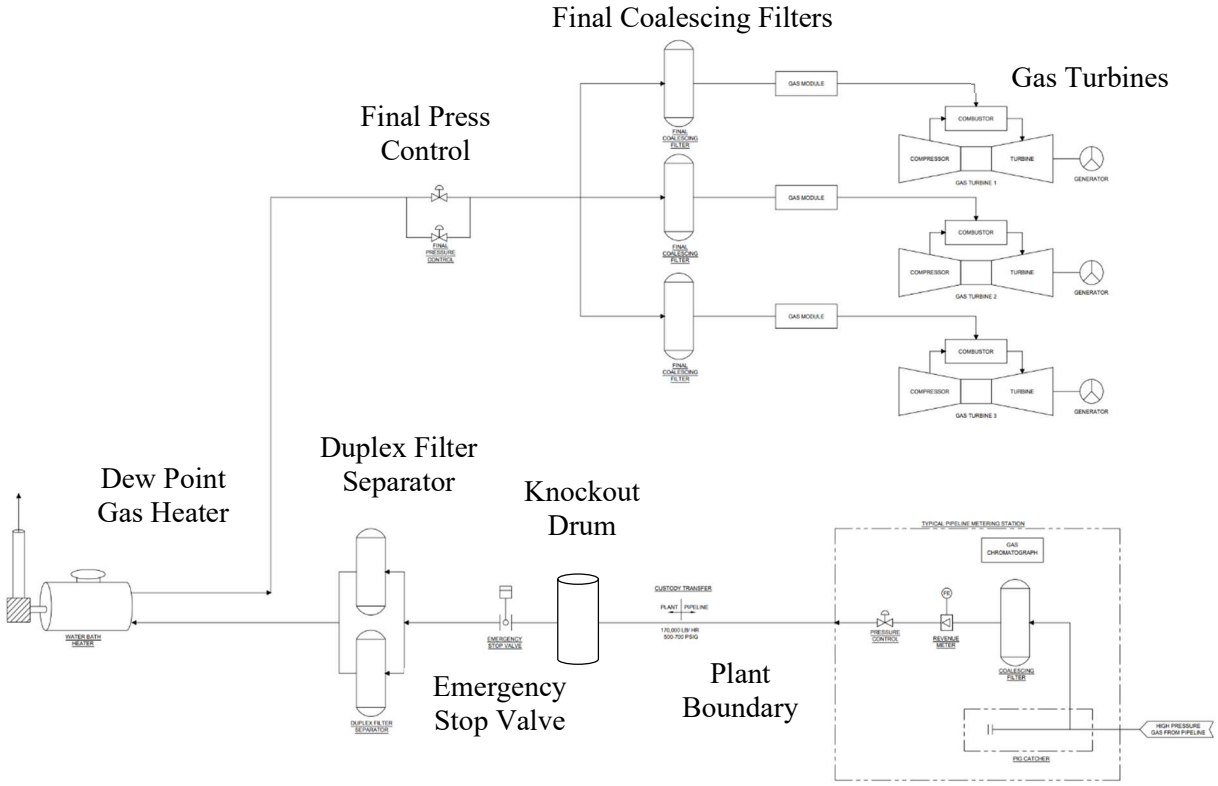
4.2.14 Describe the size and type of vehicles that would be used to deliver the fuel to the plant if, for instance, it is to be delivered by truck or train from a landfill or manure digestion facility.

No vehicles will be used to deliver natural gas to the Facility.

4.2.15 Describe and diagram on-site fuel handling from delivery through gate station or other metering through storage and end use.

Conditioning equipment will be installed to protect the system and maintain fuel requirements for the Facility. The conditioning equipment will include regulation trains, duplex filter separators, dew point heaters, coalescing filters, a final pressure control skid, and final coalescing filters. Overpressure protection will safeguard the system and duplex filter separators will enhance filtration efficiency. The dew point heater will regulate fuel temperature and prevent condensation. The final pressure control skid will provide stable pressure regulation and final coalescing filters will ensure high fuel purity. A gas chromatograph will be utilized to monitor supply at the gate station. Additional gas storage and compression is not expected to be required. Figure 2 diagrams on-site fuel handling for the Facility.

Figure 2 On-Site Fuel Handling Diagram



4.2.16 Describe all interconnections needed with existing natural gas piping infrastructure.

WE-GO will construct, own, and operate a natural gas pipeline lateral to connect the Facility to the Guardian pipeline. Foundry Ridge expects the natural gas pipeline lateral to be located in the Town of Darien, Walworth County, Wisconsin. WE-GO will be responsible for all activities required for the planning, construction, and operation of the natural gas pipeline lateral and associated metering and interconnection facilities, including studies, evaluations, permits, and regulatory notifications.

4.2.17 Discuss how communications with natural gas pipeline operators will be addressed to ensure safety during any interconnection process.

Safety and reliability of the natural gas pipeline lateral will be coordinated between Foundry Ridge, WE-GO, and Guardian Pipeline L.L.C./DT midstream. prior to construction.

4.2.18 If the fuel is biomass:

4.2.18.1 Describe the size and types of vehicles that will be used to deliver fuels to the operating plant, including where possible the source locations, off-site processing or storage locations, and routes to on-site biomass handling facilities.
4.2.18.2 Describe the process sequence of each type of fuel delivery, including truck trailer dumping.
4.2.18.3 Detail the frequency of anticipated deliveries and the quantities of fuel.
4.2.18.4 Discuss any modifications of roads, railroads, any other facilities necessary to handle delivery of fuel.
4.2.18.5 Describe and diagram off-site (if applicable) and on-site fuel handling from delivery through processing, storage, conveyance, and end use.
4.2.18.6 Estimate and describe the location(s) and expected capacity of each on-site and off-site (if any) fuel storage.

4.2.19 Provide an estimate of the fuel quantity to be used, for the following modes in million BTU per hour:

4.2.19.1 Minimum load operation
4.2.19.2 Half load operation
4.2.19.3 Rated load operation
4.2.19.4 Maximum capacity operation

The Facility will not utilize biomass as fuel.

4.3 Water – Supply, Storage, Use, Discharge

4.3.1 Supply

4.3.1.1 Describe the water supply.

Water will be supplied to the Facility by a new on-site well that will extract groundwater from the Galena-Platteville aquifer. The Proposed Site will require a high-capacity well permit due to the presence of an existing well on the property and the cumulative capacity of both wells. The Alternative Site will require a low-capacity well permit. The water supply system will include redundant pumps and storage capacity to ensure operational reliability.

4.3.1.2 Describe, diagram, and locate water supply sources for the plant.

Water will be supplied to the Facility by a new on-site well that will extract groundwater from the Galena-Platteville aquifer. Test wells were installed at both the Proposed and Alternative Sites to evaluate capacity, drawdown, and replenishment rates of the aquifer during the maximum Facility operating scenario requiring a flowrate of 55 gpm. Based on test well results, it was determined that groundwater wells at the Proposed and Alternative Sites can adequately

supply water to the Sites at the required rate of 55 gpm. Test well locations are provided in Appendix H. Final well locations will be determined during final engineering.

4.3.1.3 Describe, diagram specifications, and map water supply pipelines for the plant site(s). (See PSC website for Type 2 Water Projects Application Filing Requirements.)

Water supply pipelines at the Proposed and Alternative Sites will be determined during final engineering.

4.3.1.4 Describe any low-capacity wells (less than 70 gpm) and provide the following information.

4.3.1.4.1 Location

The test well location for the Alternative Site is provided in Appendix H. Final well location will be determined during final engineering.

4.3.1.4.2 Size

The well at the Alternative Site will be a six-inch diameter well.

4.3.1.4.3 Depth

The well at the Alternative Site will be installed at a depth of 500 feet bgs.

4.3.1.4.4 Maximum pumping capacity

The well at the Alternative Site will have a maximum withdrawal rate of 55 gpm.

4.3.1.5 Describe any high-capacity wells (70 or more gpm) and provide the following information.

4.3.1.5.1 Location

The test well location for the Proposed Site is provided in Appendix H. Final well location will be determined during final engineering.

4.3.1.5.2 Size

The well at the Proposed Site will be a six-inch diameter well.

4.3.1.5.3 Depth

The well at the Proposed Site will be installed at a depth of 500 feet bgs.

4.3.1.5.4 Maximum pumping capacity

The well at the Proposed Site will have a maximum withdrawal rate of 55 gpm.

4.3.1.5.5 Storage

The Facility will include an approximately 700,000-gallon service water storage tank, 400,000-gallon demineralized water storage tank, and 2,000-gallon potable water storage tank.

4.3.1.6 Describe, diagram specifications, and locate on-site water storage tanks, including any for supply water, cooling water, demineralized water, water/oil mixtures for processing, etc.

The Facility will include an approximately 700,000-gallon service water storage tank, 400,000-gallon demineralized water storage tank, and 2,000-gallon potable water storage tank. Wastewater from the evaporative cooler blowdown and service water from Facility drains will be collected in the approximately 40,000-gallon wastewater storage tank prior to discharge. Each gas turbine will have its own approximately 1,500-gallon water wash drain storage tank to collect wastewater. The Facility will include an oily-water separator approximately five feet in diameter and 14 feet long. Water storage tank locations are identified in the Proposed and Alternative Site Equipment Layout Schematics provided in Appendix A. Preliminary water balance diagrams for the Facility identifying inflows, reuse pathways, effluent losses, and outfall pathways are provided in Appendix J.

4.3.1.6.1 Consumptive Use

The Facility is estimated to use approximately one gpm for domestic uses. Please see the Water Balance Diagrams provided in Appendix J for more information.

4.3.1.6.2 Describe and quantify water use, including consumptive use.

Service water and demineralized water will be required to operate and maintain the Facility. The service water system will distribute low-pressure water throughout the Facility for the following uses:

- Hose stations for maintenance washdown;
- Gas turbine evaporative cooling system makeup;
- Fire protection system supply;
- Domestic water for lavatories and other uses; and
- Demineralized water treatment system.

The water supply system will be efficiently designed to minimize wastewater. To generate demineralized high purity water, the Facility will implement advanced water treatment technologies, such as ion exchange, reverse osmosis, and electrodialysis. The water supply system design will include back-flow prevention devices to separate the process users from the potable users.

Water consumption rates are provided in Sections 4.3.1.7. and the Water Balance Diagrams provided in Appendix J.

4.3.1.7 Provide water balances for the operating modes listed below. In the analysis include:

Preliminary water balance diagrams for the Facility identifying inflows, reuse pathways, effluent losses, and outfall pathways are provided in Appendix J.

4.3.1.7.1 Volume/rates into the cooling tower

No cooling tower is proposed for the Facility.

4.3.1.7.2 Evaporative losses

No cooling tower is proposed for the Facility.

4.3.1.7.3 Cooling tower blowdown

No cooling tower is proposed for the Facility.

4.3.1.7.4 Power augmentation

No power augmentation such as water injection or inlet air chilling or fogging is proposed for the Facility.

4.3.1.7.5 Evaporative coolers

Typical flow into the evaporative cooler when in service is a maximum rate of 51 gpm with 40 gpm utilized for inlet air evaporative cooling and 10 gpm blowdown.

4.3.1.7.6 Demineralizer usage

Typical demineralizer usage is 2 gpm, with a maximum rate of 40 gpm.

4.3.1.7.7 Steam system blowdown

No steam system blowdown is proposed for the Facility.

4.3.1.7.8 Potable water

Potable water usage for domestic purposes is 1 gpm.

4.3.1.7.9 Fire protection/control

The firewater system will be supplied by the firewater/service water storage tank, which is filled at a rate of 54 gpm.

4.3.1.7.10 Any other uses.

Additional water usage includes service water at 2 gpm and gas turbine wash water at 2 gpm, consistent across all operating scenarios.

4.3.1.8 Provide alternatives for reduced water consumption in cooling towers, including anti-fog cooling tower designs and all-dry cooling tower designs. Discuss the impact of the alternative(s) on:

4.3.1.8.1 Cooling water consumption
4.3.1.8.2 Capital costs
4.3.1.8.3 Energy output and efficiency
4.3.1.8.4 Visual impact
4.3.1.8.5 Noise
4.3.1.8.6 Provide flows in gallons per hour for the following operational modes:

- **Minimum load operation**
- **Half load operation**

- **Rated load operation**
- **Maximum capacity operation**
- **Maximum operation in summer (90°F)**
- **Maximum operation at average temperature (44°F)**
- **Maximum operation in winter (0°F).**

No cooling tower is proposed for the Facility.

4.3.1.9 If the plant is to burn coal or biomass, provide a separate water balance for ash handling, and describe any special Wisconsin Pollution Discharge Elimination System (WPDES) requirement resulting from ash handling water discharges (see Section 5.13.3).

The Facility will not utilize coal or biomass as fuel.

4.4 Wastewater Discharge

4.4.1 Describe, diagram specifications, and locate wastewater discharge outfall points for the plant.

The wastewater disposal system will be designed to comply with all applicable federal, state, and local regulations, and will provide separate handling for sanitary, process wastewater, and stormwater streams. Any wastewater deemed hazardous will be handled and disposed of in accordance with WDNR permits and all other applicable regulations.

Sanitary wastewater generated at the Facility will be treated through an on-site septic system designed to meet the operational needs of the Facility. The location of the septic tank and leach field will be determined during final engineering.

Process wastewater from demineralization of service water and evaporative cooler blowdown will be collected in a wastewater storage tank (approximately 40,000 gallons). The Facility will be designed to recycle wastewater streams where feasible, resulting in a maximum wastewater discharge of approximately 12 gpm (up to 17,800 gallons per day). The majority of this discharge, approximately 10 gpm, originates from evaporative cooler blowdown, which primarily occurs during summer months when ambient temperatures exceed 59ºF. Each gas turbine will be equipped with an individual wash drain storage tank to collect wastewater. These tanks will be installed in an underground containment. Drain tanks will be periodically emptied. The contents within the wastewater storage tank will be hauled off site for treatment or disposed of using existing onsite treatment systems. Non-contact water (evaporative cooling blowdown) may be discharged under the NPDES industrial stormwater program, contingent on compliance with WPDES effluent discharge standards.

Oil containments and Facility drains will be discharged to an oily-water separator, which consists of a double-walled, leak-monitored underground storage tank. The oily-water separator will be approximately five feet in diameter and 14 feet long. The oily-water-separator-cleaned effluent will be discharged to a stormwater retention pond. Oily-water separator tank contents are expected to be removed from site, on average, once every 6 months.

The stormwater runoff management system will collect and discharge stormwater from the Facility into a stormwater retention pond where it will discharged to groundwater. Any leaked oil will be separated from contact stormwater prior to discharge to the stormwater retention pond. A SWPPP will be developed and implemented in accordance with federal, state, and local regulations to minimize sediment and pollutant discharge from the site during construction and operation.

Wastewater discharge outfall points for the Proposed and Alternative Sites will be determined during final engineering.

4.4.2 Describe, diagram specifications, and map wastewater collection points and pathways/pipelines for the plant. (See Sections 5.10.3 and 5.10.4 for environmental wastewater and storm water requirements.)

Wastewater from evaporative cooler blowdown and process wastewater from demineralization of service water will be collected in an approximately 40,000-gallon wastewater storage tank prior to discharge. Each gas turbine will have its own approximately 1,500-gallon water wash drain storage tank to collect wastewater. Drain tanks will be located in underground containment sumps. Drain tanks will be periodically emptied. The contents will be hauled off site for treatment or disposed of using existing onsite treatment systems. The Facility's wastewater disposal system will be designed to recycle and reuse wastewaters produced by its processes to the extent practicable. Oil will be separated from contact stormwater prior to discharge to the stormwater retention pond. Non-contact stormwater will be discharged directly to the stormwater retention pond. Wastewater discharge outfall points for the Proposed and Alternative Sites will be determined during final engineering.

4.4.3 Describe, diagram specifications, and map water/oil separation points for the plant and any other protections for removing oil products or byproducts from wastewater.

Oil containments and gas turbine process drains will be discharged to an oily-water separator, which consists of a double-walled, leak-monitored underground storage tank. The oily-water separator will be approximately five feet in diameter and 14 feet long. The oily-water-separator-cleaned effluent will be discharged to a stormwater retention pond that will be sampled in accordance with the WPDES Individual Permit. Oily-water separator tank contents are expected to be removed from site, on average, once every 6 months. Oily-water separator tank locations for the Proposed and Alternative Sites will be determined during final engineering.

4.4.4 Note facilities in the plant design required by WPDES permit (see Section 5.10.3).

A WPDES Individual Permit will be required for storm water discharges from the Facility, including both contact and non-contact storm water and oily-water-separator-cleaned effluent that will be discharged to a designated storm water outfall. WPDES permits that may be necessary for the construction or operation of the Project are identified in Table 3.

4.5 Steam

4.5.1 If steam is to be taken for industrial use outside the power producing portion of the plant, as in a cogeneration project, describe the following.

4.5.2 Describe in detail the steam delivery system from the steam generator to the end use. Include details on removal from the steam generator/boiler/turbine system and on transport by pipeline.

4.5.3 Describe in detail the size (length and diameter), composition, and operating pressure of the proposed steam lines, the steam customers or clients, their expected level(s) of steam purchase and use, and where and how the pipeline(s) would be built.

The Facility will not produce steam which could be collected for secondary use.

4.6 Air Pollution Emissions Control Equipment

4.6.1 Describe, diagram, and map locations on the power plant site for important pollution control equipment, including precipitators, baghouses or desulfurization or selective catalytic reduction equipment.

The Facility will have passive, integrated pollution control equipment, including a DLN-1.0+ combustion system for natural gas operations for the control of NO_x emissions from each gas turbine.

4.6.2 Discuss where and how the pollution control equipment is integrated into the power plant processes like exhaust gas flow.

DLN-1.0+ combustors are considered a "front end" NO_x control technology, integral to the design of this configuration of gas turbines. The combustors operate in lean premix mode, mixing the fuel and air before the mixture enters the combustion chamber, which limits and reduces both the peak flame temperature and excess O_2 to achieve NO_x control.

4.6.3 Discuss the auxiliary power requirements for any pollution control equipment and how the loss of power would affect the unit's ability to operate.

There will be no auxiliary power requirements for pollution control equipment at the Facility.

4.7 Solid, Oil, or Hazardous Wastes, including Ash

4.7.1 Describe and diagram the production, composition, handling of waste products, including ash from fuel combustion.

The Facility will not generate solid wastes, such as ash, requiring storage or disposal. Solid wastes will be produced from construction debris, construction workers, and employees during operation of the Facility. These wastes will be collected in trash containers and hauled to a local landfill.

4.7.2 Provide a list of all hazardous chemicals to be used on-site during (1) construction and during (2) operation. Include liquid fuel as well as other process chemicals. Include also spill containment and cleanup measures. Discuss Spill Prevention Control and Countermeasure and Risk Management planning for the listed hazardous chemicals.

Typical chemicals to be used on-site during construction and pre-operation cleaning include:

- Corrosion inhibitor;
- Paint;
- Solvents and cleaners;
- Concrete curing compound;
- Fuel oil and gasoline;
- Aqueous ammonia;
- Glycol;
- Chlorine;
- Lube oil; and
- Hydraulic oil.

Typical chemicals to be used on-site during operation include:

- Glycol;
- Transformer oil;
- Carbon dioxide
- Sulfur hexafluoride;
- Sulfuric acid;
- Nitrogen;
- Propane;
- Lube oil; and
- Aqueous ammonia.

A Spill Prevention, Control, and Countermeasure ("SPCC") Plan will be developed for both construction and operation of the Project and comply with all federal and state law requirements. The SPCC Plan will establish training, inspection protocols, and response procedures. A safety data sheet inventory will be available to all site personnel and provided to local first responders. Spill kits will be made available on site. The SPCC Plan will be developed and implemented after initial construction mobilization, but before any materials are stored that would trigger the requirement for its preparation. At a minimum, the SPCC Plan will identify the following:

- Typical fuels, chemicals, lubricants, and paints to be used or stored on-site;
- Methods and location of storage;
- Locations designated for lubrication and refueling (i.e., outside of sensitive resource areas);
- Preventive measures to be used to minimize potential impacts;
- Mitigation methods to be implemented in the event of a spill;
- Location of construction spill kits (gloves, booms, sorbents, barrier materials, etc.);
- Emergency notification procedures and forms;
- Contact information for individuals requiring notification if a spill should occur; and
- Procedures for handling contaminated and spill response materials.

All contractors will be responsible for preparing their own SPCC plans that are tailored to their specific construction activities. Each SPCC plan will be regularly updated during construction.

A construction superintendent will be responsible for spill containment and cleanup. The construction superintendent will report significant spills (defined as 55 gallons or more) of chemicals and any oil, such as lubricants, fuel, or grease. The construction superintendent will also supervise the cleanup and disposal of contaminated soil and cleanup materials.

Diesel and gasoline fuel may be temporarily stored at the Facility in aboveground tanks during construction. During re-fueling or transfer of these fuels, preventative measures will be implemented to reduce the risk of spills. Lubricating oils and certain other industrial chemicals required for the Project will be stored in specially designed and covered containment areas. Routine inspections and service will keep equipment in good working condition and reduce the risk of leaks of transmission, hydraulic, or brake fluid. Chemical storage areas will be well marked and include eye wash stations, first aid kits, safety showers, hose stations, and spill kits with absorbent pads and/or material.

Larger spills will be removed from the containment area using a vacuum tank truck or be pumped into a suitable container for cleanup. Minor spills will be treated with pad and other absorbent products. The products, along with any contaminated soil, will be immediately removed and disposed of in accordance with state regulations. The pads and absorbent products will be stored on maintenance trucks or in dedicated areas that are readily accessible.

4.7.3 Identify the location and capacity of each solid waste reuse/recycling and disposal facility.

Foundry Ridge will engage a local disposal company to provide reuse/recycling and disposal services for solid waste generated. Waste is expected to be disposed of at Mallard Ridge Landfill located at W8470 WI-11, Delavan, WI 53115 and Southern Lakes Recycle located at 220 S Broad St, Elkhorn, WI 53121.

4.7.4 If coal or solid biomass is a project fuel, provide the following.

4.7.5 Identify and diagram the location(s) and paths to on-site ash handling facilities.

4.7.6 Provide a separate water balance for ash handling, and describe any special WPDES requirements resulting from ash handling water discharges. See Section 3.3.3.4.

4.7.7 Identify, locate, and describe each on-site and off-site landfill that meets DNR requirements for receiving ash from the project.

4.7.8 Identify, locate, and describe each on-site landfill that is no longer in use, including old landfills that have never been certified and are "grandfathered."

4.7.9 Identify and describe how ash would be transported off site, including potential routes to be taken by trucks or rail transporting the ash and any off-site storage or processing between the plant and the final landfill or other destination.

4.7.10 Identify and describe any beneficial use prospects for ash, including where the ash for beneficial use is to be transported.

4.7.11 In a manner parallel to that for coal ash, identify and describe any byproducts from flue gas desulfurization, including where and how these byproducts would be retrieved, handled, and transported off site.

4.7.12 If oil/water separation is necessary, identify and diagram if necessary where and how this is to occur and where and how the oily waste materials leave the plant site.

The Facility will not utilize coal or biomass as fuel.

4.8 Electricity

4.8.1 Describe, diagram, and map the step-up transformer substation to be attached to the plant. Identify and diagram lengths, widths, and heights of substation components. Identify voltages and exit pathways for transmission lines of different voltages.

Each generator will have an output of 13.8 kV and connect to a GSU transformer. The GSU transformers will step up the voltage to 138 kV to match the transmission system at the point of interconnection. Each generator will have its own 13.8 kV circuit breaker to protect and isolate the generator during maintenance or fault conditions. The substation affixed to the Facility will be approximately 450 by 165 feet with a maximum height of approximately 55 feet. The substation will include:

- 13.8 kV, 2000 ampere Air-insulated circuit breakers;
- One (1) 138 kV dead-end structure with lightning arresters and masts;
- Three (3) 138 kV sulfur hexafluoride-filled circuit breakers, power circuit breakers;
- Three (3) 138 kV group-operated high-side manual disconnect switches;
- One (1) 138 kV group-operated high-side manual disconnect switch with grounding switch;
- One (1) double-circuit 138 kV overhead transmission / bus system;
- Three (3) lots of bus work / conductors / structures and miscellaneous components;
- Three (3) single phase coupling capacitor voltage transformers;
- High voltage current and potential instrument transformers;
- Two (2) protection cabinets, including a switchyard relay panel and a line relay panel installed in a switchyard control building;
- A protection and control building, which will contain DC power equipment, DC panels, and relay/control/communication equipment;
- Internal drive path;
- Barbed wire-topped security fencing grounded to the substation ground grid;
- Vehicle and pedestrian gates;
- A bare copper grounding grid installed below grade to protect against electrical shock, with high resistance gravel/rock installed above grade;
- Power cables and control cables installed below grade in a concrete trench, polyvinyl conduit and manholes, as required;
- Lightning protection masts, as required; and
- Yard lighting and receptacles for use during maintenance or an emergency.

Substation equipment and design are identified in the Proposed and Alternative Site Equipment Layout Schematics provided in Appendix A.

4.8.2 Provide the completed transmission interconnection study report from the transmission provider, including all needed transmission system improvements and Midcontinent Independent System Operator, Inc. (MISO) requirements. State which type of interconnection process is being pursued (generator interconnection

queue, surplus generator interconnection request, generation replacement, or similar).

4.8.3 Provide a general description of the transmission line facilities required for full operation of the proposed project. Identify transmission line end points, approximate length of line, voltage, and substation and/or switching station requirements. Include information regarding who will build the transmission line. Applicant must confer with PSC and DNR staff in order to ascertain the type of information needed concerning transmission facilities required for the project. (See PSC website for Electric Transmission Line Application Filing Requirements.)

The Gen-Tie Line will be a three-phase overhead 138 kV transmission line carrying electricity from the Facility to the Darien Solar Substation. The conductor will be properly sized to meet thermal stability, vibration resistance, and any other required technical criteria. Foundry Ridge will modify the Darien Solar Substation to accept the Gen-Tie Line by extending the existing 138 kV bus and installing a circuit breaker and transmission line takeoff structure.

The Proposed Gen-Tie Line will be approximately 900 feet long and connect the Proposed Site to the Darien Solar Substation adjacent to the Facility. The Proposed Gen-Tie Line will likely consist of three to four monopole steel transmission structures. The span length between transmission structures will be approximately 300 to 700 feet. The right-of-way width will be approximately 100 feet. The transmission structure heights will be approximately 95 to 130 feet. Foundry Ridge will be responsible for constructing the Proposed Gen-Tie Line.

The Alternative Gen-Tie Line will connect the Alternative Site to the Darien Solar Substation located approximately 2.2 miles west of the Facility. Approximately 1.8 miles of the Alternative Gen-Tie Line will be double-circuited and attached to the existing RCEC Bradford to West Darien 138 kV transmission line owned by ATC. While Foundry Ridge expects to construct those segments of the Alternative Gen-Tie Line that do not attach to the new RCEC Bradford to West Darien 138 kV transmission line structures, and expects ATC to construct the segments that do, the Transmission Line Relocation Study will determine final construction responsibility, and the Pole Attachment Agreement will require agreement by both parties.

Pursuant to communications with ATC and PSCW staff, Foundry Ridge expects that the improvements associated with the Alternative Gen-Tie Line will qualify for applicable exemptions for Foundry Ridge and ATC afforded under Wis. Stats. § 196.491 and 196.49. The Alternative Gen-Tie Line will deviate no more than 60 feet (for more than one half mile in total) from the centerline of the existing RCEC Bradford to West Darien 138 kV transmission line. As further described in this Application, the Project will not have undue adverse environmental impacts. The Alternative Gen-Tie Line will require the acquisition of one-half mile or less of rights-of-way from landowners from which rights-of-way would not be required to be acquired for the existing electric transmission line. The cost of the rebuild will not exceed the threshold prescribed by Wis. Stat. § 196.49(5g)(ar)1m.b. and updated by Wis. Stat. § 196.49(5g)(b).

The segments of the Alternative Gen-Tie Line that Foundry Ridge expects to construct will likely consist of three to five monopole steel transmission structures. The segments of the Alternative Gen-Tie Line that Foundry Ridge expects ATC to construct will likely consist of eighteen monopole steel transmission structures. The span length between transmission

structures will be approximately 500 to 700 feet. The right-of-way width will be approximately 80 to 100 feet. The transmission structure heights will be approximately 95 to 130 feet.

The Substation, which is directly adjacent to the Darien Solar Substation, will serve as the point of interconnection for both Sites. The location of the Proposed and Alternative Sites and Gen-Tie Lines and the Darien Solar Substation are shown in Project Area Map in Appendix A.

Foundry Ridge filed a MISO generator interconnection queue position (J4028) at the North Creek Substation in the MISO East (ATC) DPP-2025-Cycle for 324 MW deliverable to load via NRIS. As part of the generator interconnection process, MISO will determine if any additional network upgrades are required on the regional transmission system to support the interconnection of the Project. If any network upgrades are identified, they will be permitted separately by their respective facility owners.

In addition to J4028, Foundry Ridge expects to request surplus interconnection service associated with the existing Darien Solar queue position (J850). If this request does not result in a material adverse impact on the regional transmission system or any other system, the Project may interconnect with minimal to no network upgrades. Foundry Ridge does not expect the surplus interconnection request to have a seasonal limitation.

The DPP start date for the MISO East (ATC) DPP-2025-Cycle queue cluster is scheduled for 1/5/26. The GIA associated with J850 is provided in Appendix D.

Foundry Ridge expects to negotiate transmission easement agreements for the Alternative Gen-Tie Line. If the property rights necessary to support the Alternative Gen-Tie Line are not obtained, Foundry Ridge may submit a material modification request for J4028 during the multi-year review process to shift the point of interconnection along the RCEC Bradford to West Darien 138 kV transmission line from the North Creek Substation to the Alternative Site Property. This scenario is contingent on PSCW approval of the CPCN and selection of the Alternative Site for construction. In this scenario, Foundry Ridge will provide ATC a graded pad for a new substation (approximately 5 acres) and perform other related construction activities on the Alternative Site Property in accordance with the generator interconnection process and the terms of the GIA.

5. Project Costs

Cost tables should be based on the projected in-service year. Tables must be submitted in a Microsoft Excel format, in addition to Adobe Acrobat (*.pdf) format.

5.1 Capital and Construction Costs

The estimated capital cost of the generating facility and all related facilities, broken down by major plant accounts. Indicate if project costs include Allowance for Funds Used During Construction. Identify all cost escalation factors used in the estimate (Wis. Admin. Code § PSC 111.53(1)(c)1.).

5.1.1 The construction cost of the facility.

5.1.2 Air pollution control requirements' costs that are assumed in making the project cost estimate.

5.1.3 Identification and cost of any property being retired (Wis. Admin. Code § PSC 112.06(1m)(e)). Identify potential stranded and salvage costs for any prematurely abandoned or retired assets.

5.1.4 Gross costs of alternative methods or locations that the electric utility considered for accomplishing the purpose of the project, with the reasons for rejecting the alternatives (Wis. Admin. Code § PSC 112.06(1)(f)).

5.2 Proposed Method for Financing the Project

5.2.1 The complete terms and conditions of any lease arrangements.

5.2.2 Identification of any affiliated interest approvals required for each unit.

5.2.3 If applicable, a demonstration of how the conditions of Wis. Stat. § 196.52(9)(a)3(b) on leased generation contracts have been met.

5.2.4 Comparisons of contracts between costs of the proposed project as a leased generation project, as a rate-based proposal, or as competitive bids received.

5.3 Forecasted Costs

5.3.1 Identification and justification of the costs used for the purchase power forecast.

5.3.2 Identification and justification of the fuel forecasts used for the first year of operation and levelized in nominal terms over the life of the unit or facility (over the 20-25-year study period) in $/MBTU. Identify all cost escalation factors used in the estimate (Wis. Admin. Code § PSC 111.53(1)(c)2.).

5.3.3 An estimation of the annual production cost, calculated as operating, maintenance, and fuel costs for the first year of operation and levelized in nominal terms over the life of the facility. Include all cost escalation factors used and other significant supporting data (Wis. Admin. Code § 111.53(1)(c)3.).

5.3.4 An estimation of the annual total cost, calculated as capital and production costs for the first year of operation ((mills per net kWh generated) levelized in nominal terms over the life of the facility. Include all cost escalation factors used and other significant supporting data (Wis. Admin. Code § 111.53(1)(c)4.).

5.3.5 An estimation of the useful life of facility, based on depreciation rates established by the Commission (Wis. Admin. Code § 111.53(1)(c)5.).

5.3.6 The comparative costs of the fuel alternatives identified.

5.3.7 The effects of the project on costs of operation and on the quality and reliability of service (Wis. Admin. Code § PSC 112.06(1m)(d)).

5.4 Transmission Costs, if Applicable

Table(s) detailing the projected total costs for each proposed electric transmission route broken into the major categories listed below. Indicate if project costs include Allowance for Funds Used During Construction. Each major category of costs should be broken down into logical components and/or contracts.

- **Material Costs**
- **Labor Costs**

- **Other Costs**
- **Pre-certification Costs**
- **High-Voltage Transmission Impact Fees**
- **Operation and Maintenance Costs**
- **Underground construction costs (if any) separate from overhead construction costs.**
- **Separate costs of any substation construction. (See PSC website for Electric Transmission Line Application Filing Requirements.)**

5.4.1 For 345 kV projects, a summary table of total costs (transmission and substation) for each proposed route, broken down by the following voltage classes.

- **345 kV**
- **Less than 345 kV**
- **Distribution**

The Project is a wholesale merchant plant as defined in Wis. Stat. § 196.491(1)(w)1; therefore, in accordance with PSC 111.53(2)(a), this information need not be provided.

6. Natural Resources Impacts

6.1 Mapping Requirement

Provide maps for the Proposed site and any Alternative sites. All the maps should be the most recent version available and extend a minimum of one-half mile from the proposed project boundaries (see Section 1.8).

The Proposed and Alternative Sites and Gen-Tie Lines are shown in the maps provided in Appendix A. Please see the Proposed and Alternative Site General Arrangement Schematics and Equipment Layout Schematics provided in Appendix A for detailed design information.

6.2 History of Site and Grounds

6.2.1 Describe the history of use for each generation site, including any uses that could have resulted in site contamination (petrochemical storage, fertilizer or pesticide use, etc.).

Westwood Professional Services, Inc. (“Westwood”) performed a Phase I Environmental Site Assessment (“ESA”) for the Proposed Site in July 2025. Based on historical aerial imagery, the Proposed Site Property has been used for agriculture since at least 1950. Construction of Darien Solar on the Proposed Site Property began in 2022 and completed in 2025. The Proposed Site Property currently hosts a substation, operations and building, and other facilities associated with Darien Solar. A review of government databases by Environmental Risk Information Services, including federal, state, local, and tribal environmental records, did not identify any recognized environmental conditions on the Proposed Site Property. These same databases identified two facilities within a one-mile radius of the Proposed Site Property, but due to proximity, listing type, or both, they are not considered as recognized environmental conditions. One of the facilities is an underground storage tank located on a southern adjoining property, which was closed in 2020 with no violations. The other facility is an asphalt plant within the one-mile radius

that closed in 2013. The asphalt plant, previously owned by B.R. Amon and Sons, Inc., also had no violations.

HDR performed a Phase I ESA for the Alternative Site in January 2025. Based on historical aerial imagery, the Alternative Site Property has been used for agriculture since at least 1937. A review of government databases by Environmental Data Resources, including federal, state, local, and tribal environmental records, did not identify any recognized environmental conditions on the Alternative Site Property. These same databases identified several facilities within a one-mile radius of the Alternative Site Property, but due to proximity, listing type, or both, many were not considered a recognized environmental condition. Walter & Son Waste Hauling, a biosolid management facility, located adjacent to the Alternative Site Property was among those identified. According to records, several violations have been attributed to the business, and the landowner claims biosolids from this facility have been applied to the Alternative Site Property on an annual or semi-annual basis. Under the Comprehensive Environmental Response, Compensation, and Liabilities Act, biosolid contaminants are not typically listed as hazardous waste, but some Per- and Polyfluoroalkyl Substances ("PFAS"), associated with biosolid wastewater treatment and industrial facilities, are considered hazardous. Consequently, it is possible that the on-site application of biosolids and potential runoff from the adjacent property, have resulted in PFAS accumulation that exceeds regulatory thresholds. This potential PFAS accumulation is considered a REC for the Alternative Site.

6.2.2 Describe any remediation conducted on the site(s).

A review of government databases did not identify any remediation listings associated with the Proposed or Alternative Sites.

6.2.3 If no remediation has been performed on a contaminated site, describe what must be done in order for the project to proceed.

As stated above, the application of biosolids on the Alternative Site Property has created the potential for a recognized environmental condition associated with PFAS contamination of soil and/or groundwater. To address this and ensure proper protections for innocent landowner defense under the Comprehensive Environmental Response, Compensation, and Liabilities Act, a Phase II Environmental Site Assessment will be conducted for the Alternative Site if selected for construction. There are no recognized environmental conditions associated with the Proposed Site; therefore, no further action is required.

6.3 Constructions Areas

6.3.1 Identify location, size, and land cover of laydown areas and material storage areas.

Laydown areas are shown in the Proposed and Alternative Site Construction Facilities Plan Schematics provided in Appendix A. Material storage will occur within designated laydown and construction areas. Approximately 16 acres of developed open space land cover will be disturbed to accommodate laydown areas during construction of the Proposed Site. The area was historically used for agriculture and was recently disturbed as part of construction of Darien Solar and subsequently seeded to provide erosion control and stabilization. Approximately 7 acres of land currently used for row crop agriculture will be disturbed to accommodate laydown areas during construction of the Alternative Site.

6.3.2 Identify location, size, and land cover of construction parking areas.

Construction parking areas are shown in the Proposed and Alternative Site Construction Facilities Plan Schematics provided in Appendix A. Approximately 9.82 acres, of which 9.5 acres are included in the Proposed Site laydown areas identified in Section 6.3.1, will be disturbed to accommodate parking areas during construction of the Proposed Site. The parking areas for the Proposed Site are currently used for developed open space. Approximately 2.53 acres will be disturbed to accommodate parking areas during construction of the Alternative Site. The parking areas for the Alternative Site are currently used for row crop agriculture.

6.3.3 Describe the expected use of these areas after project completion.

The temporary laydown, material storage, and construction parking areas for the Proposed Site will be returned to developed open space. The temporary laydown, material storage, and construction parking areas for the Alternative Site will be returned to row crop agriculture.

6.3.4 Describe any plans for post-construction site restoration.

Areas temporarily disturbed by construction will be restored according to the final stabilization requirements of the WPDES Construction Stormwater General Operating Permit, including recovering stone (if present), contouring and decompaction of subsoil, replacing topsoil, and establishing vegetation.

6.4 Geology

6.4.1 Describe the geology of each site.

The geology of the Proposed and Alternative Sites is characterized by Quaternary age unconsolidated sediments overlying Ordovician age bedrock. The Quaternary age surficial sediments underlying the Proposed and Alternative Sites are derived from glacial outwash deposited by meltwater streams and consist of unconsolidated gravel, sand, silt and clay.[7] The Quaternary age glacial outwash sediments extend to depths between approximately 150 to 200 feet bgs[8]. The underlying uppermost bedrock is dolomite from the Sinnipee Group. It is described as tan to buff in color, thin to medium-bedded, fossiliferous, and locally cherty[9]. Due to the thickness of the overlying glacial sediments, the likelihood of impacts from karst-related surface features—such as sinkholes—is considered low.

Based on nearby installed groundwater wells (Table 11), depth to groundwater at the Proposed and Alternative Sites is approximately 20 to 80 feet bgs, in the sand and gravel deposits of the glacial outwash sediments and alluvium overlying the Ordovician age bedrock present beneath

[7] Ham, N. and Attig, J. 2004. Preliminary Pleistocene geologic map of Walworth County, Wisconsin. Wisconsin Geological and Natural History Survey Open-File Report 2004-08.
[8] Borman, R.G. 1976. Ground-Water Resources and Geology of Walworth County, Wisconsin. Accessed February 12, 2025. Procured from: Ground-Water Resources and Geology of Walworth County, Wisconsin - Ground-Water Resources and Geology of Walworth County, Wisconsin - WGNHS
[9] Evans, T.L., Massie-Ferch, K.M., and Peters, R.M. 2004. Preliminary bedrock geologic map of Walworth, Racine, Kenosha, Milwaukee, Waukesha, Ozaukee, and Washington Counties. Wisconsin Geological and Natural History Survey Open-File Report 2004-18.

both Sites. Both Sites are above the Galena-Platteville aquifer, with a saturated thickness of approximately 150 to 200 feet. Well-known historical agricultural practices, combined with information from nearby wells, suggest elevated concentrations of nitrates may be present in the shallow aquifers within the unconsolidated, glacially derived sediments. The groundwater flow direction within the Proposed and Alternative Sites has not been calculated but is assumed to follow the local topography towards nearby surface water bodies.

Table 11 WDNR Well Database Information for Nearby Groundwater Wells

Well	WI Well Number	Well Type and Status	Location	Date Drilled	Well Depth (feet)	Casing Depth (feet)	Static Water Level (feet bgs)
1	ABQ754	PRIVATE POTABLE, ACTIVE	Proposed Site	2023	185	175	25
2	QR021	PRIVATE POTABLE, ACTIVE	0.02 miles south of the Proposed Site	2001	66	66	20
3	GU235	TRANSIENT NONCOMMUNITY, FILLED AND SEALED	0.12 miles north of the Alternative Gen-Tie Line	N/A	N/A	N/A	N/A
4	8JS583	USE NOT LISTED, ACTIVE	Directly south of the Alternative Gen-Tie Line	1986	N/A	N/A	N/A
5	EM118	PRIVATE NON-POTABLE, ACTIVE	Directly north of the Alternative Gen-Tie Line	1991	665	115	33
6	8J0636	USE NOT LISTED, ACTIVE	0.01 miles south of the Alternative Gen-Tie Line	1966	N/A	N/A	N/A
7	UJ480	PRIVATE POTABLE, ACTIVE	0.12 miles north of the Alternative Gen-Tie Line	2009	64	61	40
8	VL696	PRIVATE POTABLE, ACTIVE	0.09 miles north of the Alternative Gen-Tie Line	2006	85	81	62
9	8JO639	USE NOT LISTED, ACTIVE	0.08 miles west of the Alternative	1969	N/A	N/A	N/A

Well	WI Well Number	Well Type and Status	Location	Date Drilled	Well Depth (feet)	Casing Depth (feet)	Static Water Level (feet bgs)
			Site and south of the Alternative Gen-Tie Line				
10	GT106	TRANSIENT NONCOMMUNITY, ACTIVE	0.11 miles south of the Alternative Gen-Tie Line	N/A	N/A	N/A	N/A
11	CH672	PRIVATE POTABLE, ACTIVE	0.11 miles south of the Alternative Gen-Tie Line	1989	84	80	58
12	8JO638	USE NOT LISTED, ACTIVE	0.06 miles south of the Alternative Site	1958	N/A	N/A	N/A
13	8JO637	USE NOT LISTED, ACTIVE	0.10 miles south of the Alternative Site	N/A	N/A	N/A	N/A
14	8JS584	USE NOT LISTED, ACTIVE	0.12 miles south of the Alternative Site	N/A	N/A	N/A	N/A
15	WR447	PRIVATE POTABLE, ACTIVE	0.12 miles south of the Alternative Site	2011	130	127	41
16	AAP980	PRIVATE POTABLE, ACTIVE	0.04 miles south of the Alternative Site	2022	440	153	76
17	8JS585	USE NOT LISTED, ACTIVE	0.13 miles east of the Alternative Site	N/A	N/A	N/A	N/A
18	8JO641	USE NOT LISTED, ACTIVE	0.04 miles northeast of the	1959	N/A	N/A	N/A

Well	WI Well Number	Well Type and Status	Location	Date Drilled	Well Depth (feet)	Casing Depth (feet)	Static Water Level (feet bgs)
			Alternative Site				
19	FG761	NONTRANSIENT NONCOMMUNITY, ACTIVE	0.17 miles south of the Alternative Site	1943	303	219	40

The State of Wisconsin has seen a very low degree of seismic activity. There are no active faults in the Project Area, and the potential for seismic hazard is low[10].

6.4.2 Identify any special conditions (e.g. type and depth to bedrock, unusual soil conditions etc.) related to site geology that might create unusual or special circumstances requiring special methods or management during construction.

Terracon Consultants, Inc. performed a geotechnical investigation at the Proposed Site in June 2025. Westwood performed a geotechnical investigation at the Alternative Site in January 2025. No special conditions related to site geology were identified that will require unusual or special circumstances, or management during construction.

6.4.3 Describe any impact on geological formations (soils, glacial deposits, bedrock) for each site. Note location of active mines or quarries within 0.5 mile.

Some unconsolidated glacial outwash sediments are anticipated to be impacted during site grading and excavation for foundations. Impacts to the unconsolidated materials will be minimized by limiting grading and excavation only to the extent necessary for construction, and by implementation of the ECSWMP and associated BMPs. Due to its depth, bedrock is not expected to be impacted by the Project. There are no active mines or quarries within 0.5 miles of either the Proposed or Alternative Site.

6.5 Topography

6.5.1 Describe the general topography of each site and surrounding area.

According to United States Geological Society ("USGS") topographic data, the Proposed Site Property elevation ranges from 867 feet to 876 feet AMSL. The portion underlying the Facility is generally flat (871 to 876 feet AMSL), with elevation gradually decreasing to the southeast, and increasing to the northwest. According to USGS topographic data, the elevation of the Alternative Site Property ranges from approximately 913 to 948 feet AMSL. The portion

[10] USGS. 2022. Interactive U.S. Fault Map. Accessed May 16, 2025.

underlying the Facility is generally flat (931 to 944 feet AMSL), with elevation gradually decreasing to the southwest, and increasing to the east.

6.5.2 Describe the expected changes to site topography due to grading activities.

Grading activities will be conducted to provide sheet flow of stormwater across the Site to the extent possible. Catch basins, culverts, and storm water piping will be utilized as required to convey storm water to the stormwater retention pond. The Proposed Site will be designed to match the elevation of the Darien Solar Substation for the power block and primary generation and distribution equipment. Fill will be brought in as necessary to achieve final elevations of Project facilities and construction workspaces.

6.6 Soils

6.6.1 Identify and discuss the properties of each soil type on each site.

The NRCS Soil Survey for Walworth County, Wisconsin, identifies ten soil types within the Project Area (Table 12**)**, two soil types within the Proposed Site Property (Table 13), and seven soil types within the Alternative Site Property (Table 14). The NRCS National Hydric Soils List does not classify any soils within the Project Area, Proposed Site Property, or Alternative Site Property as hydric.

Table 12 NRCS Soil Types within the Project Area

Map Unit Symbol	Map Unit Name	Drainage Class	Hydric Soil Rating	Acres
FsB	Fox silt loam, 2 to 6 percent slopes	Well Drained	Non-hydric: 0%	0.2
LyC2	Lorenzo loam, 6 to 12 percent slopes, eroded	Well Drained	Non-hydric: 0%	1.9
LzD2	Lorenzo-Rodman complex, 12 to 20 percent slopes, eroded	Well Drained	Non-hydric: 0%	0.3
MpB	McHenry silt loam, 2 to 6 percent slopes	Well Drained	Non-hydric: 0%	0.5
PtA	Plano silt loam, gravelly substratum, 0 to 2 percent slopes	Well Drained	Non-hydric: 0%	125.1
PtB	Plano silt loam, gravelly substratum, 2 to 6 percent slopes	Well Drained	Non-hydric: 0%	9.1
SeA	St. Charles silt loam, gravelly subtratum, 0 to 2 percent slopes	Well Drained	Non-hydric: 0%	0.3
TxA	Troxel silt loam, 0 to 3 percent slopes	Well Drained	Non-hydric: 0%	7.4
WhA	Warsaw silt loam, 0 to 2 percent slopes	Well Drained	Non-hydric: 0%	26.1
WhB	Warsaw silt loam, 2 to 6 percent slopes	Well Drained	Non-hydric: 0%	19.7

Table 13 NRCS Soil Types within the Proposed Site Property

Map Unit Symbol	Map Unit Name	Drainage Class	Hydric Soil Rating	Acres
PtA	Plano silt loam, gravelly substratum, 0 to 2 percent slopes	Well Drained	Non-hydric: 0%	61.9
WhB	Warsaw silt loam, 2 to 6 percent slopes	Well Drained	Non-hydric: 0%	1

Table 14 NCRS Soil Types within the Alternative Site Property

Map Unit Symbol	Map Unit Name	Drainage Class	Hydric Soil Rating	Acres
LyC2	Lorenzo loam, 6 to 12 percent slopes, eroded	Well Drained	Non-hydric: 0%	1.9
MpB	McHenry silt loam, 2 to 6 percent slopes	Well Drained	Non-hydric: 0%	0.5
PtA	Plano silt loam, gravelly substratum, 0 to 2 percent slopes	Well Drained	Non-hydric: 0%	49.4
PtB	Plano silt loam, gravelly substratum, 2 to 6 percent slopes	Well Drained	Non-hydric: 0%	8.1
TxA	Troxel silt loam, 0 to 3 percent slopes	Well Drained	Non-hydric: 0%	7.4
WhA	Warsaw silt loam, 0 to 2 percent slopes	Well Drained	Non-hydric: 0%	26.1
WhB	Warsaw silt loam, 2 to 6 percent slopes	Well Drained	Non-hydric: 0%	18.4

6.6.2 Discuss the expected impacts on soils, including volume or tonnage to be excavated, and from where on the site.

Impacts to soils will be minimized to the extent practicable. Excavation cut and fill will be balanced to the greatest extent possible, where excavated soils for structure foundations, utilities, and site features will be used as fill in other areas to obtain necessary grades. Approximately 15,000 cubic yards of soil are anticipated to be excavated during construction of the Facility, pending final engineering. Fill will be brought in as necessary to achieve final elevations of Project facilities and construction workspaces.

6.6.3 Describe where mitigation may be required and what techniques would be used (e.g. topsoil segregation, contamination remediation). Include information on how excess soils will be handled.

In areas where geotechnical exploration indicates grading will exceed the depth of topsoil coverage, topsoil will be stripped, stockpiled, and maintained, until its reapplication following subsoil grading. Heavy construction equipment, trucks, and other vehicles used for deliveries will utilize access roads to the extent practicable. Compacted soils will be mitigated by disking,

ripping or chisel plowing, and other measures as necessary prior to final stabilization. Excess soil accumulated during construction will be used onsite to the extent practicable. Hauling soil off-site is not anticipated to be necessary. An ECSWMP will be completed to document compliance with Wis. Admin. Code § NR 216 and Wis. Admin. Code § NR 151. The ECSWMP will accompany the Notice of Intent that is submitted to obtain the WPDES Construction Stormwater General Operating Permit from WDNR. Final stormwater BMP design/selection will be determined during final engineering.

6.7 Archaeological and Historic Resources

Confidential information includes only the specific location details of archaeological and human burial sites (e.g. maps or portions of text that describe precise locations). Confidential information should be submitted on ERF as a confidential version in addition to a redacted public version. The Wisconsin Historical Society (WHS) can provide a list of qualified archaeologists, architectural historians, human burial specialists, or tribal preservation officers who may be required to perform steps of this review. Access to the Wisconsin Historic Preservation Database (WHPD) is required to complete this review. Access to WHPD is free at the WHS headquarters or can be used online for a fee. Depending on the outcome of this review, the Commission may be required to consult with the State Historic Preservation Office (SHPO). SHPO consultation may take up to an additional 30 days. The Guide for Public Archeology in Wisconsin, provides information about best management practices. Work with SHPO to submit any updated records to WHPD (i.e. new reports, updates to sites or buildings, etc.).

6.7.1 Provide maps and a description of all archaeological sites, historic buildings and districts, and human burial sites within the project's area of potential effect (APE). For archaeological and historic sites, the APE is comprised of the physical project area where any ground disturbing activity may occur (e.g. digging, heavy equipment movement, etc.). For historic buildings and districts, the APE consists of the distance that the project may be visible from the outside of the project area. Maps of archaeological and burial sites must be submitted confidentially.

HDR performed a Phase I Archaeological Survey (Appendix L) which incorporated a Cultural Resources Literature Review and Assessment detailing archaeological surveys and sites within one mile of the Project Area ("Archaeological Study Area"), and historical architectural resources and NRHP eligible or listed historic properties located within 0.25-miles of the Project Area ("Architectural Study Area"). The review included published literature and records maintained by the Wisconsin State Historic Preservation Office, Wisconsin Historical Society, and National Park Service NRHP. The Cultural Resources Literature Review and Assessment also identified areas of low, moderate, and high archaeological potential within the Project Area. During the Phase I Archaeological Survey, HDR surveyed the areas identified as high archaeological potential that could be impacted by the Project. This included the entirety of the Alternative Site Property. During fieldwork, HDR also completed an assessment of effects to historic properties within the Architectural Study Area. These analyses were conducted to ensure compliance with all applicable state and federal historic preservation laws.

6.7.2 For archaeological sites and historic buildings or districts within the APE, determine the boundaries, historic significance, and integrity of each resource. Additional field surveys may be required to make these determinations. In some cases, such as a landowner not granting land access, field surveys may instead be performed following the approval of a project.

The Cultural Resources Literature Review and Assessment identified four previously recorded archaeological resources and 14 previously completed archaeological surveys within the Archaeological Study Area. No known burials or cemeteries have been recorded within the Project Area.

The archaeological field survey identified one archaeological site (WL-0395) on the Alternative Site Property, which is comprised of a lithic surface scatter. The site has not been evaluated and may require a subsurface archaeological survey to inform NRHP-eligibility. While the southeastern corner of the Proposed Site Property was identified as high potential for Post-Contact archaeological sites, the Project as currently proposed will not incur direct impacts to that area, and it was therefore not surveyed. The rest of the Project Area was identified as low potential for archaeological resources during the Cultural Resources Literature Review and Assessment; therefore, no archaeological survey was completed.

Three SHPO-inventoried historic buildings are located within the Architectural Study Area (Table 15). Properties 9783, 9784, and 9785 contain unnamed houses.

Table 15 Historic Buildings within Architectural Study Area

Architecture and Historic Inventory ID	Historic Name	Address	Historic Use	NRHP Status	Distance from Project Area
9784	N/A	N3368 USH 14	House	Unevaluated	175 feet from the Proposed Site
9785	Cobblestone House	S SIDE OF CREEK RD .5 M W OF OLD STATE HIGHWAY 89	House	Unevaluated - Demolished	192 feet from the Proposed Site
9783	N/A	S SIDE OF CREEK RD .2 M E OF STATE HIGHWAY 15	House	Unevaluated	525 feet from the Proposed Site

Photos taken during a field visit on November 14, 2024, were used to evaluate properties for NRHP eligibility. They had not been previously evaluated. Of the three architectural properties previously recorded within the Architectural Study Area, only two are still standing. The Cobblestone House (9785) has been demolished and therefore cannot be eligible for listing in the NRHP and does not need to be assessed for adverse effects.

The remaining extant structures, both of which are unnamed houses (9784 and 9783), have experienced extensive alterations and/or removal of structures from the property. The two properties have lost integrity to the degree they cannot be eligible for listing in the NRHP and therefore do not need to be assessed for adverse effects from the Project.

6.7.3 Identify the potential project effects on each resource.

The Alternative Gen-Tie Line crosses over archaeological site WL-0395, however, avoidance measures will be taken to avoid impacts. If the Project cannot avoid impacts to archaeological site WL-0395, the site will be evaluated for NRHP eligibility prior to any disturbance.

No adverse effects to historic buildings are anticipated because all SHPO-inventoried historic buildings within the Architectural Study Area have been recommended as Not Eligible for listing in the NRHP.

6.7.4 Describe modifications to the project that would reduce, eliminate, avoid, or otherwise mitigate effects on the resources. Examples of modifications include changes to construction locations, modified construction practices (e.g. use of low-pressure tires, matting, etc.), placement of protective barriers and warning signage, and construction monitoring.

For any activity with the potential for ground disturbance, personnel will avoid archaeological site WL-0395. If Project plans change and ground disturbance within its boundary is unavoidable, WL-0395 will be evaluated for NRHP eligibility prior to any disturbance.

No modified construction practices are proposed because construction activity will not impact known historic buildings or archaeological resources.

6.7.5 For any human burial sites within the APE, contact WHS to determine whether a Burial Site Disturbance Authorization/Permit is required.

No known burials or cemeteries have been recorded within the Project Area. A Burial Site Disturbance Authorization/Permit will not be required because ground disturbing activity will not occur around human burial sites.

6.7.6 Provide an unanticipated archaeological discoveries plan. The plan should outline procedures to be followed in the event of an unanticipated discovery of archaeological resources or human remains during construction activities for the project.

An Unanticipated Archaeological Discoveries Plan outlining the procedures to be followed in the event of an unanticipated discovery of archaeological resources or human remains during construction is provided in Appendix L.

6.7.7 Notify Wisconsin Tribal Historic Preservation Officers of any Native American human burial sites and significant prehistoric archaeological sites within the APE.

Wisconsin Tribal Historic Preservation Officers will be notified if any Native American human burial sites or significant prehistoric archaeological sites are identified within the Project Area.

6.8 Existing Land Cover and Land Use (non-agricultural)

6.8.1 List and locate the existing vegetation communities on and adjacent to each site.

The Proposed Site is located on a currently vacant portion of Darien Solar. This land was assessed as cultivated crops in NLCD data and was historically used for row crop agriculture but was developed as part of the construction of Darien Solar. Construction on this site included grading and other associated construction activities. The site was seeded with a mix intended for erosion control and site stabilization. The surrounding land uses include industrial/commercial, agriculture, and developed (residential). Creek Road is located south of the Proposed Site and North Road is located east of the Proposed Site. The Proposed Gen-Tie Line will primarily cross land characterized as developed medium intensity and developed open space.

The Alternative Site is currently used for row crop agriculture, primarily corn (*Zea mays*) and soybeans *(Glycine max*). The surrounding land uses include more row crop agriculture, developed (residential), and industrial/commercial. A biosolid management facility is located south of the Alternative Site. U.S Interstate 43 and U.S. Highway 14 and are located to the south and west of the Alternative Site respectively. The Alternative Gen-Tie Line will primarily cross land characterized as cultivated crops and developed open space. The Land Cover Mapbook provided in Appendix A identifies the land cover within the Project Area.

6.8.2 List the total number of acres in each land cover type on all sites, and list the number of acres impacted in each land cover type for all sites.

HDR reviewed and revised land cover data from the NLCD based on aerial imagery and field investigations performed by Foundry Ridge representatives in summer 2025. Land cover in the Project Area is identified in Table 2. Temporary and permanent land cover impacts associated with the Project are identified in Table 16. Temporary impacts are described in Section 6.3.

Table 16 Permanent and Temporary Land Cover Impacts (Acres)

Land Cover Type (NLCD)	Proposed Site Permanent Impacts	Alternative Site Permanent Impacts	Proposed Site Additional Temporary Impacts	Alternative Site Additional Temporary Impacts	Proposed Gen-Tie Line ROW and Stringing Areas	Alternative Gen-Tie Line ROW and Stringing Areas
Cultivated Crops	6.56	15.38	0	9.45	0	9.52
Pasture/Hay	0	0	0	0	0	0.26
Developed High Intensity	0.03	0	0	0	0	3.86
Developed Medium Intensity	0.02	0	0	0	0.81	2.04
Developed Low Intensity	0.0	0	0	0	0.0	0.0

Land Cover Type (NLCD)	Proposed Site Permanent Impacts	Alternative Site Permanent Impacts	Proposed Site Additional Temporary Impacts	Alternative Site Additional Temporary Impacts	Proposed Gen-Tie Line ROW and Stringing Areas	Alternative Gen-Tie Line ROW and Stringing Areas
Developed Open Space	9.5	0.08	14.67	0	0.35	6.66
Total	**16.13**	**15.46**	**14.67**	**9.45**	**1.92**	**22.34**

6.8.3 Provide observations of prevalent animal and plant species observed during site visits. Information provided should be adequate to characterize the habitat quality of the site accurately.

The majority of the Project Area is currently utilized for row crop agriculture including corn and soybeans. The developed open space portion of the Proposed Site Property was utilized for row crop agriculture prior to 2023 when it was seeded with winter wheat to stabilize the site for disturbance and construction activities associated with Darien Solar. An area of the Proposed Site Property utilized for a soil borrow pit was planted in April of 2025 with a mixture of grasses, sedges, rushes, and cover crops to stabilize the site. Site visits conducted confirmed the presence of winter wheat (*Triticum aestivum*), Canada wild rye (*Elymus canadensis*), and some common agricultural weed species including horseweed (*Erigeron canadensis*), prickly lettuce (*Lactuca serriola*), and Canada thistle (*Cirsium arvense*) in this area.

Wildlife species that may use land in the Project Area include white-tailed deer (*Odocoileus virginianus*), coyote (*Canis latrans*) and small mammals such as mouse [Family Muridae] and vole [Family Cricetidae] species, thirteen-lined ground squirrel (*Ictiodmys tridencemlineatus),* ground hog (*Marmota monax)*, Virginia opossum (*Didelpjhis virginiana)*, eastern gray squirrel (*Sciurus carolinensis*), Eastern cottontail (*Sylvilagus floridanus)*, striped skunk (*Mephitis mephitis*), red fox (*Vulpes vulpes*) and gray fox (*Urocyon cinereoargenteus),*Canada Goose (*Branta canadensis),* American Robin (*Turdus migratorius)*, Red-tailed Hawk *(Buteo jamaicensis)*, Killdeer (*Charadrius vociferus)*, Common Grackles (*Quiscalus quiscula)*, Brown-headed cowbirds (*Molothrus ater),* common garter snakes (*Thamnophis sirtalis)*, and eastern fox snake (*Panatherophis vulpinus)* among others.

6.8.4 Describe expected impacts to plant and animal habitats and populations.

The relative lack of plant diversity and habitat structure, the temporary and seasonal nature of the crop cover, and the recent disturbance and seeding activities associated with Darien Solar have shaped the current ecological conditions of the Project Area. Construction and operation of the Project will result in limited permanent loss of nonagricultural or developed space vegetation or wildlife habitat. Wildlife communities that are known to pass through the vicinity will be displaced to nearby areas where additional habitat is available. Therefore, it is unlikely that plant and animal populations will be negatively impacted by the Project.

6.8.5 Describe forested lands in particular that are on and adjacent to the site(s) or crossed by any of the potential connecting facilities. Forested lands are defined as an upland area of land covered with woody perennial plants reaching a mature height of at least six feet tall with definite crown (closure of at least 10 percent). For the purposes of these AFRs, forested lands would not include narrow windbreaks located between agricultural areas, but would include shrublands and forested riparian areas.

There are no forested lands within or adjacent to the Proposed or Alternative Site Properties or Gen-Tie Line ROWs.

6.8.6 For each site and each potential connecting facility, describe the forested lands in particular that would be potentially affected by the project. Include the following information:

- **Type of forest**
- **Dominant species**
- **Average age and size of trees**
- **Ownership (private versus public)**
- **Current and past use.**

There are no forested lands within the Proposed or Alternative Site Properties or Gen-Tie Line ROWs.

6.8.7 Provide specific details for mitigating or minimizing construction impacts in and around forested lands.

There are no forested lands within the Proposed or Alternative Site Properties or Gen-Tie Line ROWs.

6.8.8 Describe grasslands that are on and adjacent to the site(s) or crossed by any of the potential connecting facilities. Grasslands are defined as lands covered by non-cultivated herbaceous (non-woody) vegetation predominated by perennial grasses and forbs.

There are no grasslands within the Proposed or Alternative Site Properties or Gen-Tie Line ROWs.

6.8.9 For each site and each potential connecting facility, describe the grasslands in particular that would be potentially affected by the project. Include the following information:

- **Type of grassland (prairie, pasture, old field, etc.).**
- **Dominant species.**
- **Ownership (private versus public).**
- **Use (agricultural, non-productive agricultural, recreation, natural area, etc.).**

There are no grasslands within the Proposed or Alternative Site Properties or Gen-Tie Line ROWs.

6.8.10 Provide specific details for mitigating or minimizing construction impacts in and around grasslands.

The Proposed and Alternative Sites and Proposed Gen-Tie Line ROWs avoid disturbance to grasslands.

6.8.11 Provide a detailed re-vegetation and site restoration plan that discusses the following items:

- **Types of re-vegetation proposed for impacted areas.**
- **Vegetative monitoring criteria (number of post-construction years or percent cover achieved) and methods.**
- **Invasive species monitoring and management.**

During construction, portions of the Project will be cleared, graded, and excavated to accommodate permanent facilities and temporary workspaces. Areas that are not permanently converted to facilities will be re-vegetated following construction. Existing vegetation outside of disturbance areas will be preserved where practicable as an erosion control BMP. Re-vegetation efforts will be based on the final intended land use and site-specific conditions.

Permanent Facilities and Surrounding Areas: Areas adjacent to permanent facilities, temporary workspaces, laydown areas, and disturbed lands will be seeded with a low-maintenance turf seed mix such as the Wisconsin Department of Transportation ("WisDOT") Seed Mix Number 40. The practices described in WDNR Technical Standard 1059 "Seeding for Construction Site Erosion Control" will be followed during seeding activities. Following seed installation, a mulch application will occur following the practices described in the WDNR Technical Standard 1058 "Mulching for Construction Sites".

Temporary Stabilization: Temporary seeding with annual species will be applied to disturbed areas where construction activities are paused for more than 14 days but final grading has not yet been completed. This will minimize erosion and suppress the establishment of invasive species.

All seed mixtures will meet applicable requirements for noxious weed content, labeling, and certification standards under Wis. Admin. Code Ch. DATCP 20.

Final stabilization will be considered achieved when a uniform perennial vegetative cover of at least 70 percent of the pre-construction background vegetative density is established across all disturbed areas not covered by impervious surfaces or riprap.

Vegetative monitoring will be conducted using periodic visual inspections done by a qualified vegetation contractor to ensure the Project is progressing towards and achieves final stabilization. Monitoring will also identify noxious weeds and invasive species requiring control. Effectiveness monitoring to understand management efficacy may be developed to assess the success of revegetation efforts and aid in adaptive management strategies. Periodic inspections should begin in the first growing season and continue through the operations period. Inspecting for invasive and noxious plants during the growing season throughout the life of the Project allows for the application of timely adaptive management actions.

The WDNR regulates invasive species known to be problematic, and categorizes them as either "restricted" or "prohibited" to be possessed, transported, transferred, or introduced (into the state). The current legal statuses of invasive species under Wis. Admin. Code Ch. NR. 40 can be found on the WDNR's website.

Foundry Ridge is committed to minimizing the introduction and spread of invasive species during all phases of construction and restoration activities. To facilitate the early detection and treatment of invasive plant species, periodic monitoring for invasive species will be conducted by a qualified contractor. The Project will be visually inspected, and all observed invasive species will be identified and their locations recorded. This information will be used to inform the necessary invasive species management actions to control the identified invasive species. Control actions will include hand removal, targeted mowing, and targeted herbicide applications. Priority will be given to preventing invasive species from producing viable seed and then to the long-term control and eradication.

6.9 Invasive Species

6.9.1 Describe areas where invasive species or disease-causing organisms have been observed or are a concern for the construction of the project (e.g., invasive plants, oak wilt, emerald ash borer, etc.).

During the wetland delineation field work, the invasive species Canada thistle (*Cirsium arvense*) and hybrid cattail (*Typha* x *glauca*) were observed within the Project Area. At the start of construction, the Project area will be monitored and appropriate control measures will be implemented to address observed invasive species, including Canada thistle and hybrid cattail. Additionally, ecologically disturbed areas are more susceptible to encroachment and colonization by invasive species because they are less ecological resilient and more unstable than intact native environments. Vegetation in or around the Proposed and Alternative Sites consists primarily of crop lands and developed open space. Periodic vegetation monitoring will occur to identify any new or additional invasive species found within the Project Area and any identified invasive species. The appropriate control methods will be implemented to address the invasive species observed.

6.9.2 Describe mitigation methods that would be used to avoid the spread of invasive plants or disease-causing organisms and comply with Wis. Admin. Code ch. NR 40, such as cleaning of machinery, surveys, etc.

To comply with Wis. Admin. Code Ch. NR 40, Foundry Ridge will implement measures intended to prevent the transportation, transfer or introduction of invasive, disease-causing organisms and noxious species. By undertaking the mitigation measures listed below, the Project is not anticipated to facilitate the spread or promote the growth of invasive species.

- Contractors will be required to clean construction equipment before and after its use onsite.
- Foundry Ridge will monitor the Project area for invasive species, including where disturbance has taken place, and implement control measures to avoid seed development and further dispersal. Measures may include hand clearing, targeted herbicide application, mowing, or disking soil prior to final stabilization after grading.

- Prior to the completion of the Project, temporary areas will be seeded with annual grasses and allowed to return to agricultural production. Permanent impact areas will be revegetated as described in Section 6.8.11. The establishment of desirable vegetation will help to prevent the establishment of invasive species.
- Weed-free straw will be used for mulching and erosion control. Weed-free seed will be used during revegetation.
- Foundry Ridge will monitor areas where restoration and seeding has taken place to ensure invasive species do not become established. If invasive and/or noxious plants become established, Foundry Ridge will remove invasive or noxious plant populations to avoid seed development and further dispersal. Reseeding measures will be taken in these areas as appropriate.

The invasive species monitoring protocol will be implemented by a qualified contractor. Periodic visual inspections of the establishing and established vegetation will be made to detect new invasive plant species occurrences and expansion of pre-existing ones. The timing and frequency of these inspections will be contractor-developed control recommendations based on the species and circumstances observed. These control recommendations will be reviewed and implemented as appropriate by Foundry Ridge.

6.10 Hydrology

6.10.1 Water intake, consumption, and discharge are regulated by DNR. For water-related permits, contact DNR.

Federal- and state-level permits and approvals that may be necessary for the construction or operation of the Project are identified in Table 3.

6.10.2 Potential Water Sources

6.10.2.1 Identify and fully describe all sources of water required for the project.

Service, potable, and demineralized water will be initially sourced from a new on-site well that will extract groundwater from the Galena-Platteville aquifer. Service water will be generated on-site utilizing water from the on-site well to support critical plant operations, routine maintenance, and personnel facilities. Key uses include supplying water to the turbine inlet air evaporative coolers, periodic spray cleaning of gas compressor components, and refilling the CCCW system associated with each gas turbine as evaporation occurs over time. Potable water will be generated onsite utilizing water from the on-site well to support daily operations in the control room, break rooms, restrooms, and administrative offices. Emergency response infrastructure will include plumbed eyewash stations and safety showers. Demineralized water will be generated on-site utilizing water from the on-site well for periodic turbine water washes.

6.10.3 For each proposed generation unit estimate the volume of water usage in daily, monthly, and annual averages.

Expected consumptive use for the combined systems of each GTG is 18 gpm equating to a maximum daily rate of 25,920 gallons per GTG. Each GTG is expected to have a capacity factor of approximately 20%, resulting in monthly and annual averages of 155,520 gallons and 1,866,240 gallons, respectively. As the evaporative coolers will only operate when ambient

temperatures exceed 59ºF, and the wash water is only used on a sparing maintenance basis, the actual consumptive water use is likely to be less.

6.10.4 For low-capacity (less than 70 gpm) on-site well sources, provide the following information:

6.10.4.1 Potential impacts to residential, commercial, and municipal wells.

A capacity and aquifer drawdown test was conducted in July 2025 at the Proposed Site. The test well was installed to a depth of 500 feet bgs. The static water level prior to pumping was measured at 17 feet bgs. Upon pumping at the full design rate of 55 gpm, the water level dropped to 18 feet bgs, and then remained stable at that level throughout the 12-hour testing period. The minimal drawdown and sustained stability indicate that the aquifer can reliably support the 55-gpm pumping rate with negligible hydraulic interference to surrounding wells. Thus, no measurable impacts to residential, commercial, or municipal users are anticipated.

A capacity and aquifer drawdown test was conducted in July 2025 at the Alternative Site. The test well was installed to a depth of 500 feet bgs. The static water level prior to pumping was measured at 61 feet bgs. Upon pumping at the full design rate of 55 gpm, the water level initially dropped to 80 feet bgs, and then remained stable at that level throughout the 12-hour testing period. The minimal drawdown and sustained stability indicate that the aquifer can reliably support the 55-gpm pumping rate with negligible hydraulic interference to surrounding wells. Thus, no measurable impacts to residential, commercial, or municipal users are anticipated.

The Proposed Site will require a high-capacity well permit due to the presence of an existing well on the property and the cumulative capacity of both wells and is discussed in Section 6.10.5.

6.10.4.2 Proposed mitigation/compensation plan in the event facility water usage causes impacts to nearby wells.

There are no anticipated adverse impacts to wells in the area; therefore, a mitigation or compensation plan has not been developed. If a situation requiring mitigation arises, Foundry Ridge will address it on a case-by-case basis.

6.10.5 For high-capacity (70 or more gpm) on-site well sources, provide the following information:

6.10.5.1 High-capacity well permit applications.
6.10.5.2 Analyses estimating the cone of depression and potential impacts to residences within one-half mile of each site.
6.10.5.3 Mitigation/compensation plan in the event facility water usage causes impacts to residential, commercial, or municipal wells.

The Proposed Site will require a high-capacity well permit due to the presence of an existing well on the property and the cumulative capacity of both wells. However, no high-capacity wells will be installed at the Proposed or Alternative Sites. There are no anticipated adverse impacts to wells in the area; therefore, a mitigation or compensation plan has not been developed. If a situation requiring mitigation arises, Foundry Ridge will address it on a case-by-case basis.

6.10.6 For municipal water utility groundwater sources, provide the following information:

6.10.6.1 Operating water utility and supply well(s) location(s).
6.10.6.2 Capacity of municipal well(s) providing service.
6.10.6.3 Reserve capacity of the municipal system.
6.10.6.4 Potential impacts on the ability of the utility to provide water to municipal customers.

No municipal water utility will supply water to the Proposed and Alternative Sites.

6.10.7 Methods proposed for delivering the municipal water to plant sites, including the following information:

6.10.7.1 Size of pipeline(s) required.
6.10.7.2 Proposed routes for pipeline(s).
6.10.7.3 Length of proposed pipeline(s).
6.10.7.4 Entity or entities that would construct, operate and own the pipeline.
6.10.7.5 Property owners located along the water supply pipeline routes, identified also on maps and in the mailing list.

No municipal water utility will supply water to the Proposed and Alternative Sites.

6.10.8 For surface water sources, provide the following information:

6.10.8.1 Identify the proposed surface water source.
6.10.8.2 If the water source is one of the Great Lakes, submit documentation for compliance with the Great Lakes Compact.

No surface water sources will be used to supply water to the Proposed or Alternative Sites.

6.10.9 Physical information for the intake structures/facilities including:

6.10.9.1 Location(s).
6.10.9.2 Depth of intake.
6.10.9.3 Detailed maps and engineering drawings.
6.10.9.4 Construction methods and sequence of construction.

No intake structures/facilities will be used to supply water to the Proposed or Alternative Sites.

6.10.10 Environmental characterization of the area at and near the intake facilities including:

6.10.10.1 Substrate at the intake location.
6.10.10.2 Fish and invertebrate species and communities present.
6.10.10.3 Mammal and bird use in the immediate area.
6.10.10.4 Vegetative cover on and near the shoreline.
6.10.10.5 Discuss and describe the potential impacts of the water withdrawal on the water body and downstream users, including:

6.10.10.6 Physical modeling of the effects of the expected intake structure and water withdrawal on bottom sediments and biota.
6.10.10.7 Fish and invertebrate species and communities.
6.10.10.8 Mammal and bird use in the immediate area.
6.10.10.9 Vegetative cover on and near the shoreline.
6.10.10.10 Discuss the minimization and mitigation of identified potential impacts.

No intake structures/facilities will be used to supply water to the Proposed or Alternative Sites.

6.10.11 Water Consumptive Use

6.10.11.1 Identify each source of water that would go through consumptive use.

Water will be supplied to the Facility by a new on-site well that will extract groundwater from the Galena-Platteville aquifer. Consumptive use for the Facility will be from the new on-site well.

6.10.11.2 For each generation unit, estimate consumptive water usage in daily, monthly, and annual averages.

Expected consumptive use for the combined systems of each GTG is 18 gpm equating to a maximum daily rate of 25,920 gallons per GTG. Each GTG is expected to have a capacity factor of approximately 20%, resulting in monthly and annual averages of 155,520 gallons and 1,866,240 gallons, respectively. As the evaporative coolers will only operate when ambient temperatures exceed 59ºF, and the wash water is only used on a sparing maintenance basis, the actual consumptive water use is likely to be less.

6.10.11.3 Estimate the total consumptive use/net loss of water from the water source (e.g. through contact or non-contact cooling, plant processes, once-through cooling, evaporative cooling etc.). Refer to Wis. Stat. § 281.35 regarding water loss approvals.

Expected consumptive use for the combined systems of each GTG is 18 gpm equating to a maximum daily rate of 25,920 gallons per GTG. Each GTG is expected to have a capacity factor of approximately 20%, resulting in monthly and annual averages of 155,520 gallons and 1,866,240 gallons, respectively. As the evaporative coolers will only operate when ambient temperatures exceed 59ºF, and the wash water is only used on a sparing maintenance basis, the actual consumptive water use is likely to be less.

6.10.12 Wastewater Discharges

6.10.12.1 Submit the DNR WPDES permit applications. (Check with the PSC docket coordinator for whether electronic or paper copies are required for the PSC.)

A WPDES Individual Permit will be required for stormwater discharges from the Facility, including non-contact stormwater, oily-water-separator-cleaned effluent, and potentially evaporative cooler blowdown that will be discharged to a stormwater retention pond. The permit application will be submitted after receipt of a CPCN, if approved.

6.10.12.2 Provide figures and descriptions of the proposed wastewater discharge structures including:

- **Location and type of discharge site (surface water, groundwater, or municipal wastewater system).**
- **Description of the proposed wastewater pipes and facilities (e.g., length, composition, and location of pipes).**
- **The construction methods and sequence of construction.**

The oily-water separator and potentially evaporative cooler blowdown will be discharged to groundwater through a designated on-site stormwater retention pond. Discharge piping comprised of high-density polyethylene will be installed below grade and routed to minimize surface disturbance and avoid environmentally sensitive areas where practicable. The oily-water separator and discharge pipe will be installed during the installation of the stormwater management system. Wastewater discharge outfall points for the Proposed and Alternative Sites will be determined during final engineering. Construction will be performed using open trenching. The sequence will begin with staking and clearing, followed by trench excavation or boring, pipe placement, backfilling, and surface restoration. Measures will be taken throughout construction to minimize erosion and sedimentation, and all activities will comply with applicable permitting requirements. Final details regarding stormwater discharge structures will be determined during final engineering.

6.10.12.3 Provide the chemical and physical attributes of discharged waters including:

- **Use and expected concentration of biocides and metals.**
- **Temperature of discharge at the discharge point and the expected variation on a yearly basis.**
- **Estimated volumes of wastewater that would be discharged in daily, monthly, and annual averages.**
- **Estimated average, maximum and minimum daily flows in cubic feet per second and the expected variation on a yearly basis.**

No biocides or metals are expected to be discharged through the stormwater management or septic systems. Based on the design of the streams potentially contributing to site discharge (septic discharge, contact/noncontact stormwater, oily-water-separator-cleaned effluent, evaporative cooler blowdown), discharge temperature is expected to be ambient, varying based on site conditions and air temperature. The volume of wastewater discharged to the stormwater management system is expected to be 11.6 gpm and 1 gpm to the septic system, as identified in Appendix J. This combined 12.6 gpm equates to 18,144 gal/day, 108,864 gal/month, and 1,324,512 gal/year when considering the 20% capacity factor of the Facility. In terms of volumetric flow, the minimum wastewater discharge rate will be 0 cubic feet per second (“cfs”), the average wastewater discharge rate will be 6.11 cfs, and the maximum wastewater discharge rate will be 40.425 cfs. Wastewater discharge is expected to be higher in the summer when the Facility is operating with the evaporative coolers in service and lower in the spring and fall when dispatch is less likely.

6.10.12.4 If discharging to surface waters, submit the following:

- **Description and engineering drawings of any structure(s) proposed to be installed at the end of a discharge pipe (diffuser, screen, etc.)**
- **Characterization of the environment of the discharge pipe and outfall location including, but not limited to:**
  - **Type of substrate.**
  - **Water quality.**
  - **Fish and invertebrate species and communities present.**
  - **Mammal and bird use of the immediate area.**
  - **Vegetative cover in or near the shoreline.**
- **Discussion and characterization of the potential impacts of the discharge on the water body and downstream users, including:**
  - **Modeled results of the expected effects of the discharge on bottom sediments, flora, and fauna.**
  - **The anticipated temperature mixing zone configuration, and the expected variation on a yearly basis.**
  - **If appropriate, the proposed methods for invasive mussel control.**
- **If discharging to a local municipality, submit the following:**
  - **Identification of the local municipality.**
  - **Agreements regarding quantity and quality of discharge to be treated.**
  - **Identification and descriptions of any secondary impacts to the municipal treatment system and any user charges (e.g., Will the municipality require any expansion or upgrades to handle new wastewater stream?)**
  - **Location and depth of discharge outfall structure(s)**

The oily-water-separator-cleaned effluent and potentially evaporative cooler blowdown will be discharged to groundwater through a designated on-site stormwater retention pond. Wash drain storage tank contents and any other wastewater will be hauled to the Village of Darien Wastewater Treatment Plant for treatment or disposed of using existing onsite treatment systems. Foundry Ridge does not anticipate any expansions or upgrades will be necessary to handle drain storage tank contents if hauled to the Village of Darien Wastewater Treatment Plant.

6.10.13 Storm Water Management

Erosion control and storm water management plans must be submitted to DNR if the project involves land disturbance in excess of one acre. DNR plan approvals may also authorize construction site pit and trench dewatering wastewater discharges to surface waters or seepage systems. Permit applications should be submitted also to the PSC.

6.10.13.1 Provide a description of a storm water management plan with diagrams that complies with local and state regulations.

6.10.13.2 Describe and provide drawings detailing any proposed storm water management facilities including:

- **Any on-site wastewater and storm water treatment facilities.**
- **Any solids or sludges generated from operations.**

- **Any process water pretreatment facilities (demineralizers), blow-down characteristics, and solid waste by-products from water pre-treatment.**
- **Estimate the amount of flow that storm water management facilities would be designed to handle.**
- **Identify locations of the point(s) of collection and discharge.**
- **If the generation unit would burn solid fuel (e.g. coal-fired or biomass-fired), describe the storm water management plan for fuel handling and storage facilities and ash handling and disposal facilities.**
- **A description of an erosion control plan with diagrams that complies with local and state regulations.**

An ECSWMP will be completed to document compliance with all applicable statutes and regulations. The ECSWMP will accompany the Notice of Intent that is submitted to obtain the WPDES Construction Stormwater General Operating Permit from WDNR. Final stormwater BMP design/selection will be determined during final engineering.

6.11 Air Quality

Air pollution control and air quality impacts are regulated by DNR. For instructions on filing for DNR air quality permits, consult with DNR.

6.11.1 List the DNR air permits required for the project and the status of air permit applications, matching permits to proposed locations, units, and fuels.

Federal- and state-level permits and approvals that may be necessary for the construction or operation of the Project are identified in Table 3. Applications for the Air Pollution Control Construction Permit and Title V Air Permit are currently in development and anticipated to be filed on 8/15/25. Separate applications will be filed for the Proposed and Alternative Sites. The applications will propose three natural gas turbines, one natural gas-fired dew point heater, and one natural gas-fired emergency backup generator.

6.11.2 Describe the type(s) of fuel to be used.

The gas turbines, dew point heater, and emergency backup generator will be fueled by natural gas and will not include backup fuel capability. Additionally, natural gas will be used for building heating.

6.11.3 Provide a narrative of the air emissions modeling and results, including the following:

6.11.3.1 Control technologies expected to be required for the project for each type of fuel and pollutant (include specific methods or plans to control mercury emissions if the proposed plant will burn coal). Include a diagram of the boiler and any pollution controls.

The Facility will have passive, integrated pollution control equipment, including a DLN-1.0+ combustion system for natural gas operations for the control of NO_x emissions from each gas turbine.

6.11.3.2 Estimated hourly emission rates in pounds per hour at full, 75 percent, and minimum emissions compliance load for:

- **Carbon monoxide (CO)**
- **Nitrogen oxides (NOx)**
- **Particulate matter less than 10 microns and less than 2.5 microns in diameter (PM10, PM2.5)**
- **Sulfur dioxide (SO2)**
- **Mercury (Hg)**
- **Volatile organic compounds (VOCs)**
- **Sulfuric acid (H2SO4)**
- **Lead (Pb)**
- **Greenhouse gases, including carbon dioxide (CO2), methane (CH4), and nitrous oxide (N2O), and fluorinated gases like hydrofluorocarbons (HFCs), perfluorocarbons (PFCs), and sulfur hexafluoride (SF6). Include emissions associated with other project inputs besides the boiler fuel itself.**

Table 17 provides the estimated hourly emissions rates in pounds per hour for the applicable Facility pollutants at 100 percent, 75 percent, and minimum emissions compliance load ("MECL").

Table 17 Estimated Hourly Emissions Rates

Pollutant	Estimated Hourly Emissions Rates (lb/hr)[a]		
	100% Load	75% Load	38% Load
NO_x	18.55	15.04	10.40
CO	53.68	42.39	32.43
VOC	1.86	1.47	1.12
$PM_{10}/PM_{2.5}$	4.30	4.30	4.30
SO_2	1.27	1.04	0.73
H_2SO_4	0.097	0.080	0.056
GHGs (CO_2e)	115,155	95,578	64,670
Maximum Single HAP (Formaldehyde)	0.242	0.198	0.138
Pb	0.00	0.00	0.00
Hg	0.00	0.00	0.00

(a) Estimated hourly emissions rates represent the MECL per gas turbine which is equivalent to 38% load at an ambient temperature of 59°F while meeting emissions limits.

6.11.3.3 Estimated maximum expected annual emission rates from project sources for the pollutants listed in Section 5.14.3.2

Table 18 provides the estimated maximum expected annual emission rates from Project sources for the pollutants listed in Section 6.11.3.2. Project sources include the three gas turbines, a dew point heater, and an emergency backup generator.

Table 18 Estimated Maximum Expected Annual Emission Rates

Pollutant	Maximum Annual Emissions Rates (tpy)
NO_X	98.21
CO	248.47
VOC	13.60
SO_2	4.87
PM	16.66
PM_{10}	16.62
$PM_{2.5}$	16.62
H_2SO_4	0.38
GHGs (CO_2e)	516,309
Pb	2.85E-05
Hg	1.48E-05
Maximum Single HAP (Formaldehyde)	1.32
Total Hazardous Air Pollutants ("HAPs")	3.12

6.11.3.4 Projected emissions in tons-per-year (tpy), by source and for the entire plant, for the pollutants listed in Section 5.14.3.2.

Table 19 provides the projected emissions in tons-per-year ("tpy"), by source and the for the entire Facility, for the pollutants listed in Section 6.11.3.2.

Table 19 Projected Emissions

Emissions Sources	NO_X	CO	VOC	SO_2	PM	PM_{10}	$PM_{2.5}$	H_2SO_4	GHGs (CO_2e)	Pb	Hg	Maximum Single HAP (Formaldehyde)	Total HAPs
Combustion Turbine #1	31.22	80.51	3.98	1.60	5.44	5.44	5.44	0.12	169,573.87	0.00	0.00	0.41	0.86
Combustion Turbine #2	31.22	80.51	3.98	1.60	5.44	5.44	5.44	0.12	169,573.87	0.00	0.00	0.41	0.86
Combustion Turbine #3	31.22	80.51	3.98	1.60	5.44	5.44	5.44	0.12	169,573.87	0.00	0.00	0.41	0.86
Fuel Gas Heater	2.15	2.15	0.46	0.06	0.29	0.29	0.29	0.01	6,803.43	2.85E-05	1.48E-05	0.00	0.11

Emissions Sources													
	NO_X	**CO**	**VOC**	**SO_2**	**PM**	**PM_{10}**	**$PM_{2.5}$**	**H_2SO_4**	**GHGs (CO_2e)**	**Pb**	**Hg**	**Maximum Single HAP (Formaldehyde)**	**Total HAPs**
Emergency Backup Generator	2.40	4.79	1.20	2.45E-03	0.04	0.00	0.00	-	682.99	-	-	8.56E-02	4.21E-01
Natural Gas Piping Fugitives	-	-	-	-	-	-	-	-	40.46	-	-	-	-
SF6 Circuit Breakers	-	-	-	-	-	-	-	-	60.13	-	-	-	-
Total Project Emissions	**98.21**	**248.47**	**13.60**	**4.87**	**16.66**	**16.62**	**16.62**	**0.38**	**516,308.60**	**2.85E-05**	**1.48E-05**	**1.32**	**3.12**

6.11.3.5 How the proposed project would affect air quality in relation to NAAQS and PSD increments.

The Facility will not cause any violation of the NAAQS or any PSD thresholds to be exceeded.

6.11.3.6 Provide background ambient levels for criteria pollutants in micrograms per cubic meter at 1, 3, 8, & 24-hour intervals. Also provide annual totals, if available.

Table 20 provides background ambient concentration levels for PM_{10} and CO. Table 21 provides background ambient concentration levels for NO_2. Table 22 provides background ambient concentration levels for SO_2.

Table 20 PM_{10} and CO Ambient Concentration Levels

Pollutant	Averaging Period	Background Value ($\mu g/m^3$) [(a)]
PM_{10}	24-Hour	27.00
CO	1-Hour	494.70
	8-Hour	420.2
[(a)] Wisconsin DNR (2018-2020) Background Concentrations Low Value, October 2021.		

Table 21 NO_2 Ambient Concentration Levels

Hour of Day	NO_2 Concentration ($\mu g/m^3$) [(a)]											
	January	**February**	**March**	**April**	**May**	**June**	**July**	**August**	**September**	**October**	**November**	**December**
1	15.33	13.25	9.94	7.39	8.44	6.37	5.95	5.97	5.17	7.59	13.10	21.04
2	14.07	14.08	9.38	7.01	7.38	6.49	5.76	5.73	5.23	7.43	13.53	19.65
3	14.39	14.91	8.98	7.11	7.19	6.76	5.89	5.62	5.32	7.28	14.43	18.27

Hour of Day	NO_2 Concentration (µg/m³) [a]											
	January	February	March	April	May	June	July	August	September	October	November	December
4	17.18	15.35	9.94	7.15	6.89	6.02	6.54	4.71	5.23	6.37	14.04	18.14
5	17.96	14.56	9.68	6.54	6.28	7.85	6.10	5.14	4.71	5.58	13.78	18.75
6	13.17	13.86	9.55	8.15	6.98	6.71	6.15	5.49	4.58	6.54	14.65	14.26
7	14.39	13.21	9.81	7.98	7.02	7.19	5.76	5.32	4.88	7.24	14.04	13.86
8	15.09	12.99	10.12	8.50	6.50	7.02	6.67	4.88	5.19	7.28	13.43	14.69
9	13.73	13.21	9.50	7.24	6.93	7.24	5.41	4.53	5.32	7.63	13.39	15.35
10	12.56	11.99	8.81	7.32	6.93	6.19	5.06	4.58	5.10	6.54	11.77	15.00
11	11.77	11.42	8.07	7.28	6.93	6.71	4.27	4.05	4.49	6.28	10.86	14.30
12	11.42	12.08	8.24	8.37	6.06	6.76	5.10	4.10	4.10	6.76	11.21	13.73
13	11.77	10.90	8.98	15.09	6.67	7.37	5.97	5.23	4.27	8.11	11.64	13.47
14	12.16	10.64	7.72	12.30	6.89	5.76	6.93	4.71	6.71	6.45	12.30	13.86
15	12.91	10.42	8.46	8.63	8.81	8.68	6.19	6.32	4.32	7.24	13.39	15.39
16	14.04	11.21	9.20	7.02	10.29	7.41	6.76	8.46	4.14	7.37	12.91	15.83
17	15.74	13.30	8.85	7.50	9.11	6.71	4.32	9.98	4.27	7.46	13.82	15.83
18	16.00	15.22	8.76	6.76	7.67	7.28	5.14	4.53	4.88	9.33	14.00	16.00
19	16.31	14.04	9.42	6.76	7.46	6.10	6.02	4.97	4.71	10.51	14.08	16.92
20	16.39	14.56	10.68	7.46	7.85	6.06	8.02	6.06	5.10	9.20	16.31	18.22
21	16.39	13.43	9.59	7.72	8.98	6.45	7.41	5.49	5.36	9.16	19.49	17.75
22	17.92	12.91	8.41	7.50	8.02	6.80	7.24	5.97	5.01	8.41	20.97	16.31
23	17.13	11.82	9.46	7.76	8.11	6.85	8.89	5.14	5.32	8.46	19.97	15.96
24	15.52	12.03	9.64	7.50	8.94	6.15	7.67	4.97	5.14	8.15	19.45	17.88

[a] Wisconsin DNR (2018-2020) Background Concentrations Low Value, October 2021.

Table 22 SO_2 Ambient Concentration Levels

Hour of Day	SO_2 Concentration (µg/m³) [a]											
	January	February	March	April	May	June	July	August	September	October	November	December
1	0.96	0.78	0.96	1.31	2.01	1.48	1.05	1.66	1.57	1.22	0.87	1.22
2	0.96	0.70	0.78	1.09	1.79	1.53	1.05	1.31	1.31	1.09	0.92	1.09
3	0.96	0.70	0.70	1.05	1.66	2.01	1.05	1.05	1.22	1.05	0.96	1.13
4	1.31	0.87	0.87	1.13	1.31	2.18	1.22	0.96	1.13	0.96	1.13	1.31
5	1.66	0.78	1.13	1.13	1.05	2.01	1.31	0.87	1.13	0.87	0.96	1.40
6	1.83	0.87	1.05	2.01	0.87	2.01	1.22	0.78	0.87	0.78	1.13	1.22
7	1.83	0.78	1.13	1.40	1.22	2.18	1.31	1.66	1.13	0.87	1.13	1.05
8	2.01	1.05	1.05	3.23	1.22	2.09	1.92	1.66	1.83	1.22	1.05	1.13
9	2.53	1.40	1.57	2.79	1.57	2.35	2.62	2.53	1.74	1.22	1.13	1.22

Hour of Day	SO_2 Concentration (µg/m³) [a]											
	January	February	March	April	May	June	July	August	September	October	November	December
10	2.70	1.48	2.09	1.83	1.57	2.53	4.88	1.92	2.62	1.48	1.48	1.40
11	2.70	1.66	2.01	1.74	1.22	2.01	3.58	2.09	2.27	1.57	1.74	1.66
12	2.62	2.01	1.57	2.09	1.05	1.83	1.83	1.74	1.74	2.27	1.48	3.40
13	2.96	1.83	1.40	2.27	1.66	2.09	1.31	1.48	1.74	1.83	1.57	4.19
14	2.18	1.66	1.31	2.44	1.13	1.48	1.31	1.57	1.74	1.83	1.83	4.01
15	2.44	1.57	1.57	2.53	1.05	1.57	1.40	2.01	1.83	1.66	1.74	3.75
16	1.83	1.48	1.66	2.53	1.13	2.18	1.48	1.57	1.48	1.66	1.74	3.23
17	1.83	1.48	1.66	2.79	1.22	1.83	1.66	1.40	1.57	1.57	1.48	2.35
18	1.40	1.48	1.40	2.09	1.31	2.09	1.22	1.40	1.31	1.57	1.13	1.74
19	1.22	1.57	1.13	1.83	1.13	1.83	1.31	1.31	1.48	1.74	1.13	1.40
20	1.13	2.01	1.31	1.57	1.13	1.48	1.57	1.22	1.40	1.40	1.05	1.40
21	1.22	1.66	1.13	1.31	1.22	3.23	1.66	1.31	1.40	1.40	1.05	1.31
22	1.05	1.22	1.05	1.13	1.31	3.05	1.40	1.40	1.66	1.40	1.05	1.40
23	1.05	1.22	0.87	1.83	1.74	2.35	1.31	1.48	1.57	1.40	0.96	1.31
24	1.05	0.96	0.78	2.01	1.74	1.92	1.66	1.57	1.66	1.40	1.05	1.22

[a] Wisconsin DNR (2018-2020) Background Concentrations Low Value, October 2021.

6.11.3.7 Provide modeling results comparing expected project emissions with the NAAQS (include the expected impact distance and direction).

Table 23 compares modeled concentrations of potential Project emissions with the NAAQS.

Table 23 NAAQS Comparison

Pollutant	Averaging Period	Modeled Concentration (µg/m³)	Modeled Concentration Form	NAAQS (µg/m³)	Distance to Maximum[a] (m)	Direction to Maximum
CO	1-Hour	98.06	1st highest	40,000	388	E
	8-hour	62.58	1st highest	10000	137.00	E
NO_2	1-Hour	27.87	5-year average 1st highest	188	277.00	SE
	Annual	0.39	1st highest	100.0	At Fenceline	SE
PM_{10}	24-Hour	1.09	1st highest	150	55.00	W
SO_2	1-Hour	0.61	5-year average 1st highest	196	200.00	SE
	3-Hour	0.57	1st Highest	1300	282.00	SE

[a] As measured from the fence line nearest to the maximum concentration.

6.11.3.8 Provide all PSD increment modeling results, including those for known pollutants that did not hit the significance threshold.

The Project does not trigger major source PSD permitting requirements for any pollutant; therefore, a PSD increment modeling analysis is not required.

6.11.3.9 Provide expected annual emissions in tons per year (tpy) of CO2, N2O, CH4, and hydrofluorocarbons by source and for the entire plant in two tables:

- **Assuming maximum capacity operation for 8760 hours per year.**
- **Assuming an anticipated capacity factor that allows for outages and the electric market variations.**
- **Provide tables listing annual organic and inorganic hazardous air pollutant (HAP) emission estimates, with an estimated tpy emitted for each HAP and a total estimated tpy for all HAP emissions.**
- **Describe sources and projected amounts of dust ("fugitive dust") and how it would be controlled.**
- **Discuss dust sources and control measures to be used during and after construction.**
- **Discuss fugitive dust emissions from fuel storage piles and fuel handling and conveyance, and measures to be taken to control them.**

Table 24 provides the expected annual emissions of CO_2, N_2O, CH_4, and hydrofluorocarbons ("HFCs") by source and for the entire Facility at maximum capacity operation. Table 25 provides the expected HAPs for the Facility at maximum capacity operation.

Earthmoving work, temporary road access, and other construction activities will create dust. Operation activities are not expected to generate significant amounts of dust. Foundry Ridge will implement dust control measures to suppress fugitive dust emissions. Those measures include:

- Implementing design to maintain compacted soil conditions or using aggregates to surface access roads, on-site roads, and parking lots;
- Strategically staging construction activities to limit the area of disturbed soils exposed at any given time, to the extent practicable; and
- Watering unpaved roads, disturbed areas (e.g. scraping, excavation, backfilling, grading and compacting), and loose materials, as needed.

Table 24 Expected Annual Emissions at Maximum Capacity Operation

Emissions Sources	Expected Annual Emissions at Maximum Capacity Operation (tpy)		
	CO_2	CH_4	N_2O
Combustion Turbine #1	424,057.34	6.64	0.66
Combustion Turbine #2	424,057.34	6.64	0.66
Combustion Turbine #3	424,057.34	6.64	0.66
Fuel Gas Heater	11,340.35	0.21	0.02

Emissions Sources	Expected Annual Emissions at Maximum Capacity Operation (tpy)		
	CO_2	CH_4	N_2O
Emergency Backup Generator	11,926.73	0.48	0.10
Natural Gas Piping Fugitives	-	1.45	-
SF6 Circuit Breakers	-	-	-
Total Project Emissions	**1,295,439.09**	**22.06**	**2.11**

Table 25 Expected Annual HAP Emissions at Maximum Capacity Operation

HAP	Three Combustion Turbines	Dew Point Heater	Emergency Backup Generator	Total		
1,3-Butadiene			1.85E-03	0	2.77E-03	4.61E-03
2-Methylnaphthalene			0	1.37E-06	0	1.37E-06
3-Methylchloranthrene			0	1.03E-07	0	1.03E-07
7,12-Dimethylbenz(a)anthracene			0	9.11E-07	0	9.11E-07
Acenaphthene			0	0	1.06E-04	1.06E-04
Acenaphthylene			0	0	6.39E-05	6.39E-05
Acetaldehyde			0	0	4.72E-05	4.72E-05
Anthracene			0	0	5.43E-05	5.43E-05
Acrolein			0	0	2.77E-03	2.77E-03
Benz(a)anthracene			0	0	5.30E-05	5.30E-05
Benzene			0	1.03E-07	0	1.03E-07
Benzo(a)pyrene			0	1.03E-07	0	1.03E-07
Benzo(b)fluoranthene			0.172	0	0	0.172
Benzo(g,h,i)perylene			0	1.37E-07	0	1.37E-07
Benzo(k)fluoranthene			0.027	0	0.011	0.038
Chrysene			0	1.03E-07	0	1.03E-07

HAP	Three Combustion Turbines	Dew Point Heater	Emergency Backup Generator	Total		
Dibenz(a,h)anthracene			0.051	1.20E-04	6.60E-03	0.058
Dichlorobenzene			0	6.84E-08	0	6.84E-08
Ethylbenzene			0	1.03E-07	0	1.03E-07
Fluoranthene			0	6.84E-08	0	6.84E-08
Fluorene			0	1.03E-07	0	1.03E-07
Formaldehyde			0	0	2.03E-04	2.03E-04
Hexane (n)			0	0	7.39E-05	7.39E-05
Indeno(1,2,3-cd)pyrene			0	0	5.39E-05	5.39E-05
Naphthalene			0	0	5.72E-05	5.72E-05
Phenanthrene			0	1.03E-07	0	1.03E-07
Polycyclic Aromatic Hydrocarbons			0	6.84E-08	0	6.84E-08
Propylene Oxide			0	6.84E-05	0	6.84E-05
Pyrene			0	0	0.29392	0.294
Toluene			0.137	0	1.04E-04	0.137
Xylenes			0	0	8.89E-05	8.89E-05
Arsenic			0	1.71E-07	0	1.71E-07
Beryllium			0	1.59E-07	0	1.59E-07
Cadmium			1.231	4.27E-03	0.086	1.321
Chromium			0	0.103	0	0.103
Cobalt			0	1.03E-07	0	1.03E-07
Lead			0	0	0.013	0.013
Manganese			0	0	1.72E-04	1.72E-04
Mercury			5.58E-03	3.47E-05	4.05E-04	6.02E-03
Nickel			0	9.68E-07	0	9.68E-07

HAP	Three Combustion Turbines	Dew Point Heater	Emergency Backup Generator	Total		
Selenium			9.44E-03	0	5.89E-04	0.010
Total	**2.59**	**0.11**	**0.42**			**3.12**

6.12 Solid Waste Handling and Disposal

6.12.1 Identify any solid waste that would be produced as a result of electricity production (e.g. coal or biomass ash and sorbent by-products, scrubber sludge).

6.12.2 Describe the composition and quantity of the wastes over the expected life of the plant and how each would be handled.

6.12.3 List the DNR solid waste and landfill permits required for the project and the status of permit applications.

6.12.4 Identify the location(s) on the project site where solid waste (bed ash, fly ash and flue gas desulfurization by products, etc.) would be stored, transported, and loaded for removal.

6.12.5 Discuss the potential for beneficial use or reuse of ash and other combustion byproducts.

6.12.6 Locate and describe the potential ash landfills that could be utilized for combustion wastes. Describe how much ash would need to be transported and how many trucks that transport would require. Map the most probable truck routes to the landfill(s).

The Facility will not generate solid wastes, such as ash, requiring storage or disposal. Solid wastes will be produced from construction debris, construction workers, and employees during operation of the Facility. These wastes will be collected in trash containers and hauled to a local landfill. Foundry Ridge will engage a local disposal company to provide reuse/recycling and disposal services for solid waste generated. Waste is expected to be disposed of at Mallard Ridge Landfill located at W8470 WI-11, Delavan, WI 53115 and Southern Lakes Recycle located at 220 S Broad St, Elkhorn, WI 53121. No WDNR solid waste or landfill permits are expected to be required for the Project.

7. Community Impacts

7.1 Community Resource Maps and Imagery (see Section 1.8)

7.1.1 Provide maps showing sites in relation to nearest residences and other buildings, indicating distances to both the site boundary and the plant footprint.

7.1.2 Provide additional maps, if necessary showing proximity to schools, daycare centers, hospitals, and nursing homes up to one-half mile from the site.

The Land Ownership Mapbook provided in Appendix A identifies the Proposed and Alternative Sites in relation to the nearest residences, schools, daycare centers, hospitals, nursing homes, places of worship, cemeteries, and other buildings.

7.2 Current Land Ownership

7.2.1 Identify plans for temporary or permanent acquisition of lands or rights-of-way from landowners.

Foundry Ridge executed an Option Easement Agreement with WEPCO, WPSC, and MGE to support siting of a portion of the Proposed Site and Proposed and Alternative Gen-Tie Lines. The Option Easement Agreement is provided in Appendix B. Foundry Ridge executed two Purchase Option Agreements with Dean Kincaid Enterprises LLP. One of the Purchase Option Agreements supports siting of the remaining portion of the Proposed Site and the other supports siting of the Alternative Site. Foundry Ridge is in the process of securing Transmission Easement Agreements for the Alternative Gen-Tie Line.

7.2.2 State whether or not the applicant has an option to purchase for each site or connecting facility route under review.

Foundry Ridge executed two Purchase Option Agreements with Dean Kincaid Enterprises LLP. One of the Purchase Option Agreements supports siting of a portion of the Proposed Site and the other supports siting of the Alternative Site.

7.3 Local Zoning

7.3.1 Provide copies of any zoning ordinances affecting each project site and the area within one-half mile of the site boundary (provide only the pages introducing and identifying the document and directly citing the ordinance language).

Available zoning ordinances affecting the area within one-half mile of the Project Area are provided in Appendix M.

7.3.2 Describe (1) the existing zoning and (2) the expected zoning changes needed for the project.

The Proposed and Alternative Sites and Gen-Tie Lines are located in the Prime Agricultural Land District (A-1) for Walworth County. The Zoning Map provided in Appendix A identify the Proposed and Alternative Sites in relation to the Zoning Districts. The Project is a utility use as defined in Wis. Admin Code § ATCP 49.01(19). In accordance with Wis. Stat. §§ 91.42(2), 91.46(1)(f), and the Walworth County zoning ordinance, utility uses are a permitted use of land zoned A-1; therefore, no changes to zoning are required for the Project.

7.3.3 List the total number of acres in each existing zoning classification on each site, and list the number of acres impacted by the project in each existing zoning classification.

The Proposed and Alternative Sites and Gen-Tie Lines are located in the Prime Agricultural Land District (A-1) for Walworth County. The permanent footprint of the Proposed Site is approximately 16 acres. An additional approximately 15 acres will be temporarily disturbed during construction of the Proposed Site. The Proposed Gen-Tie Line right-of-way is approximately 2 acres. The permanent footprint of the Alternative Site is approximately 15 acres. An additional approximately 9 acres will be temporarily disturbed during construction of the Alternative Site. The Alternative Gen-Tie Line right-of-way is approximately 22 acres.

7.3.4 Describe zoning changes to be requested of local government for the proposed project at each site. Report the name of the entity responsible for zoning changes, the process required to make a zoning change, and the outcome or expected outcome for those changes.

In accordance with Wis. Stat. §§ 91.42(2), 91.46(1)(f), and the Walworth County zoning ordinance, utility uses are a permitted use of land zoned A-1; therefore, no changes to zoning are required for the Project.

7.4 Land Use Plans

7.4.1 Provide relevant portions of any land-use plans adopted by local governments within one-half mile of the project boundary for each site. Include not only general land-use plans, but also other relevant planning documents such as county recreation plans, farmland preservation plans, highway development plans, and sewer service area plans.

Available land use plans affecting the area within one-half mile of the Project Area are provided in Appendix M.

7.4.2 Describe how the project blends into or conflicts with any of the land-use plans and how any conflicts might be resolved.

A review of the Walworth County Comprehensive Plan indicates that Walworth County goals include "minimizing impacts on natural and agricultural resources, maintaining rural character, and avoiding excessive demands on rural public facility and service systems" outside of Urban Service Areas, which include the Proposed and Alternative Sites. Further, the Comprehensive Plan notes that the population of Walworth County is expected to grow from 92,000 persons in 2000 to 145,800 persons in 2035. Such growth is expected to raise demand on utilities.

The footprint of the Project will be relatively small and all temporary impact areas will be returned to their current use, including agriculture, following construction. Therefore, the Project will be consistent with County goals to minimize impacts on agricultural resources outside of Urban Service Areas. Additionally, the Project will improve energy production in the region and would not impart excessive demands on rural service systems. Furthermore, the Proposed Site is collocated with Darien Solar, which is consistent with County goals.

7.5 Agriculture

7.5.1 Describe any farming activities at the site(s), current or in the immediate past.

The Proposed Site is located on a currently vacant portion of Darien Solar, which was previously used for row crop agriculture prior to construction of Darien Solar. The Alternative Sites is currently used for row crop agriculture.

7.5.2 Identify any agricultural practices that may be affected by the project construction or operation including but not limited to irrigation systems, windbreaks, aerial seeding or spraying, organic farms, and drainage systems (tiles, ditches, laterals).

The Proposed Site and Gen-Tie Line will not impact any agricultural practices. The Alternative Site will permanently impact approximately 15 acres of land currently used for row crop agriculture. Foundry Ridge anticipates that drain tile on the Alternative Site Property will be damaged during construction of the Project. Foundry Ridge does not anticipate construction or operation of the Project to affect other irrigation systems, windbreaks, aerial seeding or spraying, organic farms, and drainage systems.

7.5.3 Identify the number and size of parcels enrolled in farmland preservation programs and permanent agricultural or conservation easements that may be affected by the project.

A portion of one of the two parcels comprising the Proposed Site Property (10.4 acres), and the Alternative Site Property, consisting of one parcel (112.43 acres), are participating in Walworth County's Farmland Preservation Program. Neither property is enrolled in a Farmland Preservation Agreement. No other agricultural or conservation easements or programs are anticipated to be affected by the Project.

7.5.4 Provide specific details for mitigating or minimizing construction impacts in and around agricultural lands.

Prior to construction, contractors will be required to undergo environmental training that will explain and discuss BMPs for wetlands, waterways, and other sensitive areas. The first step in construction will be to survey, stake, and prepare workspaces for clearing. Environmentally sensitive areas will be clearly marked to designate them as avoidance areas. In the absence of stable ground conditions, matting may be used in wet areas to minimize soil disturbance.

In areas where geotechnical exploration indicates grading will exceed the depth of topsoil coverage, topsoil will be stripped, stockpiled, and maintained, until its reapplication following subsoil grading. Heavy construction equipment, trucks, and other vehicles used for deliveries will utilize access roads to the extent practicable. Compacted soils will be mitigated by disking, ripping or chisel plowing, and other measures as necessary prior to final stabilization. Excess soil accumulated during construction will be used onsite to the extent practicable. An ECSWMP will be completed to document compliance with all applicable statutes and regulations. The ECSWMP will accompany the Notice of Intent that is submitted to obtain the WPDES Construction Stormwater General Operating Permit from WDNR. Final stormwater BMP design/selection will be determined during final engineering.

7.5.5 Identify any parcels of land in the project area that may impact a Drainage District, and identify the Drainage District if applicable. The following applies when any part of a project impacts a Drainage District.

The Project is not located within a Drainage District and no water originating from the Project will discharge to any Drainage District; therefore, no impacts to Drainage Districts will occur.

7.5.6 The County Drainage Board will need to be notified before undertaking any action, including any change in land use that will alter the flow of water into or from a district drain, increase the amount of soil erosion, or the movement of sediment solids to a district drain or affect the operation of the drainage district, or the costs incurred by the Drainage District. This applies to parcels of land that receive water

from, or discharge water to a Drainage District, regardless of whether the land is included in the Drainage District.

There is no need to notify the County Drainage Board because the Project is located more than nine miles from the nearest Drainage District. The Project will have no impact on any district drain, including altering the flow of water into or from a district drain, or affecting the movement of sediment solids to a district drain. The Project will have no impact on the operation of the Drainage District or the costs incurred by the Drainage District.

7.5.7 Indicate whether the project would require an Agricultural Impact Statement (AIS) from DATCP

Pursuant to Wis. Stat. 32.035(4)(a), an Agricultural Impact Statement ("AIS") is only required if a project involves the actual or potential exercise of eminent domain that may impact an interest in more than five acres of farmland. Pursuant to Wis. Stat. § 196.491(1)(w)1, the Project is a wholesale merchant plant. Accordingly, Foundry Ridge is not vested with the powers of eminent domain and therefore will not require an AIS.

7.5.8 If the project would affect any properties used for agricultural purposes, submit one of the following, either:

7.5.8.1 A completed Agricultural Impact Notice (see DATCP website and search "Agricultural Impact Notice" for appropriate form or contact DATCP).

7.5.8.2 A release letter from DATCP stating that an AIS will not be written for this proposed project. Discuss induced voltage issues as they relate to the project areas and connecting facility routes. Provide for each power line route:

- **The number of confined animal dairy operations within one-half mile of any proposed electric transmission or distribution centerline on or off the project site alternatives.**
- **The number of agricultural buildings located within 300 feet of the proposed centerline.**
- **A discussion of induced voltage issues as they relate to the project and its related power line routes.**

As described in Section 7.5.7, an AIS will not be required.

There are no confined animal dairy operations identified within one-half mile of Project facilities. Twenty-two agricultural buildings and seven residences were identified within 300 feet of Project facilities.

There are no buildings located within 300 feet of the Proposed Gen-Tie Line. Twenty agricultural buildings, six residences, and two industrial buildings are located within 300 feet of the Alternative Gen-Tie Line.

Foundry Ridge does not anticipate the Project will create hazards related to induced voltage. Issues stemming from induced voltage are generally caused by electrical circuits that have not been property grounded or isolated, such as those found in older buildings like factories and barns.

Foundry Ridge will be constructed to meet the standards of Wis. Admin. Code chapters SPS 316, SPS 371, PSC 114 - Wisconsin State Electrical Code, and the National Electric Safety Code. Foundry Ridge will ensure proper system design by closely adhering to the electric codes and guidelines of applicable law, while also mitigating the potential risks of induced voltage.

Please see the Electric and Magnetic Fields ("EMF") Study provided in Appendix N for more information.

7.6 Conservation Easements and Programs

7.6.1 Within one-half mile of each site alternative and along each connecting facility route, identify properties with conservation easement agreements.

There are no known conservation easement agreements located within one-half mile of the Project Area.

7.6.2 For each conservation easement that would be crossed by a route, identify and discuss:

- **The holder of the easement and the type of easement.**
- **The conditions of the easement.**
- **What approvals are necessary to construct on the property.**
- **The potential impacts to the landowner, including costs, penalties etc. if there is construction on the property.**
- **Whether the proposed project is consistent with the stated goals of the easement.**

There are no known conservation easement agreements that will be crossed by the Proposed and Alternative Gen-Tie Lines.

7.6.3 Identify properties within proposed project sites or connecting facility ROWs that are enrolled in the Managed Forest Law (MFL) or Forest Crop Law (FCL) programs, and discuss how they might be affected.

There are no properties enrolled in the Managed Forest Law ("MFL") or Forest Crop Law ("FCL") programs will be impacted by Project facilities.

7.7 Communication with Potentially Affected Public

7.7.1 List all attempts made to communicate with and provide information to the public.

Foundry Ridge is committed to serving as a dedicated member of the community and will continue earning and honoring the community's trust over the life of the Project. Our engagement with the community goes well beyond job creation, economic investment, and providing reliable energy. We strive to build lasting partnerships with civic leaders, property owners, and community members. We pride ourselves on transparent communication and being responsive to public feedback. Public outreach materials compiled and shared with the community thus far are provided in Appendix O.

Landowners

Foundry Ridge representatives have been meeting with area landowners to discuss the Project and site control since 2024. Since joining, landowners participating in the Project have received periodic updates via email, phone, and in-person meetings.

Regulatory Agencies

On January 15, 2025, Foundry Ridge representatives met with PSC and WDNR staff for the Project's Pre-Application Meeting. On July 17, 2025, Foundry Ridge representatives held a consultation with WDNR and USFWS staff. In these meetings, Foundry Ridge representatives discussed Project plans, surveys, siting, BMPs, and special status species.

Local Governmental Units

Beginning in 2025, Foundry Ridge representatives held several meetings with local government representatives to introduce and discuss the Project. To date, the list of local governmental entities engaged includes the Town of Darien Town Board, Village of Darien Board of Trustees, Village of Darien Public Works, and Walworth County Land Use and Resource Management Department.

General Public

Foundry Ridge representatives held a public meeting on May 7, 2025, which was advertised on the Town of Darien and Village of Darien meeting boards, the Project website, newspaper ads, and mailed postcards. Project representatives have regularly attended local government meetings and followed up with individuals who expressed an interest to learn more about the Project. Foundry Ridge representatives have presented to the Town of Darien and Village of Darien during regularly scheduled Town Board meetings and engaged in public comment and question and answer sessions.

Online

Foundry Ridge created a Project-specific website for the general public to access information about the Project. The Project website can be accessed at https://FoundryRidge.Invenergy.com and has been shared with local community members to circulate in news articles about the Project and in public events.

7.7.2 Provide a description of public information meetings and who was invited.

Foundry Ridge representatives held a public meeting on May 7, 2025, which was advertised on the Town of Darien and Village of Darien meeting boards, the Project website, newspaper ads, and mailed postcards. Table 26 lists meetings and events held within the local community attended by Foundry Ridge representatives.

Table 26 Public Outreach Meetings / Events

Date	Meeting / Event
1/6/25	Town of Darien Monthly Town Hall Meeting
3/10/25	Walworth County Senior Zoning Officer
3/11/25	Walworth County Economic Development Alliance

Date	Meeting / Event
3/12/25	Town of Darien Monthly Town Hall Meeting
3/12/25	Village of Darien Public Works Meeting
3/14/25	Village of Darien Zoning Administrator
3/19/25	Policy Director of RENEW Wisconsin
3/27/25	Delavan Chamber of Commerce
3/27/25	Director of Clean Wisconsin
5/6/25	Town of Darien Monthly Town Hall Meeting
5/7/25	Project Office Hours – Village of Darien
6/3/25	Town of Darien Monthly Town Hall Meeting
7/8/25	Darien Fire/EMS Donation
7/24/25	Darien Town Chair, Town Clerk, and Public Works Superintendent

7.7.3 Submit copies of the public outreach mailings and handouts.

Public outreach materials compiled and shared with the community thus far are provided in Appendix O.

7.7.4 Provide electronic copies of written public comments (e.g., letters, emails, forms, etc.) submitted prior to filing the application with the PSC.

Written public comments received by Foundry Ridge representatives prior to Application filing are provided in Appendix O.

7.8 Demographics

7.8.1 Provide a description of the area within one-half mile of each site in terms of population, racial or ethnic composition, and income levels.

The areas within one-half mile of the Proposed and Alternative Sites are sparsely populated. The population concentration nearest to the Proposed and Alternative Sites is the Village of Darien. Demographic information within a one-half mile radius of the Proposed and Alternative Sites is provided in Table 27. Data is not available for the Town of Darien.

Table 27 Demographic Information for One-Half Mile Buffer

Location	Population	Racial Make-up						Household Mean Income
		White	Black/African American	American Indian/Alaska Native	Asian	Native Hawaiian	Some Other Race Alone	
Proposed and Alternative Sites								
Village of Darien	1,271 ± 205	1,046	15	3	6	0	140	$64,025 ± $14,460
Census Tract 6	5430 ± 374	4,582	29	41	17	0	334	$83,737 ± $8,152
Census Tract 6, Block Group 2	1,718 ± 227	1,492	16	3	6	0	140	N/A
Census Tract 6, Block Group 1	1,205 ± 332	983	0	3	0	0	80	N/A
Proposed Site								

Location	Population	Racial Make-up						Household Mean Income
		White	Black/African American	American Indian/Alaska Native	Asian	Native Hawaiian	Some Other Race Alone	
Census Tract 32	2,499 ± 243	2,212	12	3	4	0	35	$100,127 ± 14,194
Census Tract 32, Block Group 3	745 ± 148	721	0	3	0	0	19	N/A
Source: 2022 Census (US Department of Commerce, United States Census Bureau, American Community Survey, accessed 06/13/2025, American Community Survey (ACS) (census.gov)								

7.8.2 Provide the same information (required in item 6.8.1) for the township, county, or Standard Metropolitan Statistical Area as a whole.

The Proposed and Alternative Sites are located in Walworth County, Wisconsin. Demographic information for Walworth County is provided in Table 28.

Table 28 Demographic Information for Walworth County

Location	Population	Racial Make-up						Household Mean Income
		White	Black/African American	American Indian/Alaska Native	Asian	Native Hawaiian	Some Other Race Alone	
Walworth County	105,380	89,439	734	49	1,157	0	3,400	$104,187 ± 6,377
Source: 2022 Census (US Department of Commerce, United States Census Bureau, American Community Survey, accessed 02/10/2025, American Community Survey (ACS) (census.gov)								

7.9 Local Government Impacts

7.9.1 For each site, list all services to be provided (e.g. water, fire, EMS, police, security measures, and traffic control) by the city, town, and/or county during (1) construction and (2) when the plant is in operation. Specifically, address community and facility readiness for incidents such as fires, boiler implosions/explosions, coal dust explosions and critical piping failures.

The Project will not connect to municipal water or sewer services. Should emergency medical or fire services be required during construction or operation, Foundry Ridge anticipates they will be provided by the Joint Fire/EMS Department of the Village and Town of Darien. Local medical care centers within 10 miles of the Project include The Doctor's Office in Darien, Mercyhealth Delavan, and Aurora Health Center, also in Delavan. The Walworth County Police Department will provide traffic control and police protection.

Foundry Ridge will require that all on-site contractors meet state, federal, and industry best practice standards for employee safety and public safety. In order to ensure first responders are prepared for potential on-site incidents, Foundry Ridge will regularly coordinate with local first response agencies for training, in accordance with the Project's Emergency Response Plan. For any scenarios related to Project construction or operation that may be unfamiliar to local first responders, Foundry Ridge will arrange for professional training to alleviate any concerns related to preparedness.

Foundry Ridge does not anticipate that Project construction or operation will require a change in first responder services or capacity. Additionally, Foundry Ridge does not anticipate the Project will affect community readiness for emergency incidents. The Facility does not include boilers. Potential fires and critical piping failures are not expected to impact the community outside the Facility.

7.9.2 Identify all local government infrastructure and facility improvements required (e.g. sewer, water lines, railroad, police, and fire) for each site.

No local government infrastructure and facility improvement projects are anticipated to be required to support the Project. Foundry Ridge will work with the local governments to address necessary improvements that may result from the Project, such as road repair.

7.9.3 Describe the effects of the proposed project on city, village, town and/or county budgets for these items.

Foundry Ridge does not expect the Project to negatively impact the municipal budgets for Walworth County, the Town of Darien, or the nearby Village of Darie or City of Delavan. The level at which existing community services, such as police, fire, and emergency medical services, are provided by surrounding municipalities is expected to be sufficient to meet the requirements of the Project. Additionally, local government budgets will be positively impacted by hosting the Project. As described in more detail in Section 7.9.5, Wisconsin's Shared Revenue Utility Aid Program provides for payments to be distributed annually to communities hosting large electric generating facilities.

7.9.4 Estimate the revenue to any city, village, township, or county resulting from the project in terms of taxes, shared revenue, or payment in lieu of taxes.

Table 29 provides the expected breakdown of annual payment distributions between the Town of Darien and Walworth County for the Proposed Site in accordance with Wisconsin's Shared Revenue Utility Aid Program. In addition to the $2,000 per MW base utility aid payment, the Proposed Site qualifies for an additional $900 per MW incentive payment as it is located on the site of Darien Solar. Table 30 provides the expected breakdown of annual payment distributions between the Town of Darien and Walworth County for the Alternative Site in accordance with Wisconsin's Shared Revenue Utility Aid Program.

Table 29 Proposed Site Estimated Annual Shared Revenue Payments

Local Government	Amount
Town of Darien	$361,800
Walworth County	$577,800
Total	**$939,600**

Table 30 Alternative Site Estimated Annual Shared Revenue Payments

Local Government	Amount
Town of Darien	$216,000
Walworth County	$432,000
Total	**$648,000**

7.9.5 Describe any other benefits to the local community at each site (e.g., employment, reduced production costs, goodwill gestures).

During peak construction periods, approximately 150 workers are anticipated to be on-site. The amount of labor that will be sourced locally is unknown at this time, and will be dependent on several factors, including the construction contractor selected, local labor market, and the availability of qualified employees at the time of construction. During operation, Foundry Ridge expects that up to six full-time employees will reside locally.

Throughout the development process, Foundry Ridge has engaged with the community and made goodwill donations to the following groups:

- Delavan – Delavan Chamber of Commerce
- Darien Fire/EMS Department

7.9.6 List any existing facilities that would be retired as a consequence of the proposed facilities at either site, and discuss any job impacts that could result from the retirement(s).

Foundry Ridge does not anticipate existing facilities will be retired as a result of the Project.

7.9.7 Describe how natural gas pipelines in the project area would be impacted during construction and operation of the project, whether the project would have any risk of damaging pipelines, any special safety measures that would be utilized to construct near or under pipelines, and any changes that may be required for local first responders to address emergencies involving the pipelines due to the project.

Prior to initiating construction, all crossings of Project infrastructure with existing infrastructure will be field located by a licensed land surveyor. Crossing agreements with the owners of the infrastructure identified will be negotiated, as appropriate. If a pipeline crossing is identified, the pipeline operator will be engaged to develop a plan to design, construct, and maintain Project facilities in a manner that does not interfere with the safety, reliability, and access of the pipeline. Safety and reliability of the natural gas pipeline lateral will be coordinated by Foundry Ridge, WE-GO, and Guardian Pipeline L.L.C./DT Midstream prior to construction. No changes are anticipated to be required by local first responders to address emergency situations.

7.9.8 State how the applicant plans to work with the natural gas pipeline facility owners to mitigate potential stray currents on the pipelines.

WE-GO will perform a cathodic protection review. If stray current is identified as a concern, corrosion mitigation measures will be incorporated.

7.9.9 Describe safety measures that would be taken to meet the pipeline operator's policies around their natural gas pipelines.

WE-GO will follow all applicable safety regulations, operations and procedures.

7.9.10 Describe plans to work with the pipeline operators to develop a plan to construct and maintain facilities in a manner that does not interfere with the pipeline operators' ability to access their pipelines and rights-of-way.

High Voltage Transmission Line Fee Distributions

If a high-voltage electric transmission line is expected to be one of the connecting facilities for this project, provide the following:

- **An estimate of all high-voltage impact fees that must be paid to the Department of Administration by the applicants as required under Wis. Stat. §196.491(3g).**
- **Identify which components of the total project cost were used as the base cost and how the fees were calculated.**
- **Provide estimates of one-time and annual environmental fee payments that would be made to each affected city, village, town, and county.**

Prior to initiating construction, all crossings of Project infrastructure with existing infrastructure will be field located by a licensed land surveyor. Crossing agreements with the owners of the infrastructure identified will be negotiated, as appropriate. If a pipeline crossing is identified, the pipeline operator will be engaged to develop a plan to design, construct, and maintain Project facilities in a manner that does not interfere with the safety, reliability, and access of the pipeline.

The Gen-Tie Line will operate at 138 kV, therefore no annual or one-time environmental impact fees contemplated in Wis. Stat. § 16.969 apply.

7.10 Workforce

7.10.1 Provide information on the workforce size and skills required for the plant construction and operation.

The construction workforce will be comprised of management staff, site superintendents, skilled craftsmen, engineers, start-up support personnel, and other miscellaneous service providers. A variety of skilled labor will be required during construction, including but not limited to, carpenters, heavy equipment operators, laborers, millwrights, ironworkers, masons, pipefitters, and electricians. Manufacturer representatives will be onsite periodically. At the start of construction, the number of workers onsite will be relatively small and steadily increase over time. During peak construction periods, approximately 150 workers are anticipated to be onsite.

During operations, there will be approximately six full-time employees onsite. Operations staff will include trained and qualified gas turbine operators, maintenance technicians, and supervisory and administrative personnel.

7.10.2 Estimate how much of the expected workforce would come from local sources.

The amount of labor that will be sourced locally is unknown at this time, and will be dependent upon the construction contractor selected, local labor market, and the availability of qualified employees when construction staffing begins. It is Foundry Ridge's expectation that the construction contractor will prioritize local partnerships and hiring. Foundry Ridge estimates that approximately 60% of the construction workforce will be Wisconsin residents. During operation, Foundry Ridge expects that up to six full-time employees will reside locally.

7.11 Traffic, Roads, Railroads

7.11.1 Describe types of vehicles that will visit and be used on site during construction. Include vehicles used by workers arriving to and departing from the construction sites as well as construction and supply vehicles.

Construction equipment and vehicles may include, but is not limited to, tree removal equipment, cranes, backhoes, drill rigs, dump trucks, water trucks, front-end loaders, bucket trucks, bulldozers, motor graders, compactors, rollers, skid steers, telehandlers, forklifts, boring trucks, trenchers, augers, pier and piling machines, flatbed tractor trailers, flatbed trucks, self-propelled modular transporters, pickup trucks, concrete trucks, concrete mixers, puller-tensioner equipment, asphalt pavers, and various transport trailers.

All-terrain vehicles and light duty trucks will be used for employee transportation across the site. Equipment and materials will be delivered by semitrucks, dump trucks, concrete and boom trucks, and water trucks. Workers will commute to and from the site primarily by personal vehicles.

7.11.2 Describe how construction traffic will enter and leave each site.

Construction traffic will enter and leave the Proposed Site from North Road, a two-lane, paved town road that feeds into Creek Road then U.S. Highway 14. Construction traffic will enter and leave the Alternative Site from Creek Road, a two-lane, paved county road that feeds into U.S. Highway 14. No traffic control light or turn lane exists at either location. During construction, temporary off-road parking will be available on-site. The bulk of vehicle travel to the site will stem from U.S. Interstate 43.

7.11.3 Give an estimate of traffic frequency and volume during construction. Include access traffic by workers, equipment and supply deliveries, and any earthmoving equipment.

During construction, traffic volume and frequency will vary with the number of employees on site and the nature of ongoing construction activities. During the initial stages of construction, weekday traffic to the site is estimated to be approximately 25 to 50 vehicles, increasing to approximately 150 to 200 vehicles during peak construction periods.

After site mobilization, most traffic to the site will consist of personal vehicles, dump trucks, and flatbed trucks carrying heavy earthwork equipment. After civil work is completed, traffic volume will increase because more workers will be needed and delivery of permanent equipment and components will begin. Deliveries are expected to account for between 5 and 15 trucks per day. Bulk deliveries—for materials such as crushed stone, hot asphalt paving, and redi-mix concrete—may occasionally exceed 15 vehicles on a given day. Traffic associated with construction—such as trucks, large delivery trucks in particular—will decrease during later construction stages, but personal vehicle commute travel is expected to remain high until startup and commissioning.

7.11.4 Estimate the potential impacts of construction traffic on the local transportation system at each site. In particular, provide information on:

- **Probable routes for delivery of heavy and oversized plant equipment loads.**
- **Potential for road damage and any compensation for damage.**
- **Anticipation of any traffic congestion caused by the project.**
- **Any changes in rail line usage and any interference with existing rail traffic.**
- **How heavy loads or large loads would be handled.**
- **Describe changes in the types and frequency of traffic expected on roads and railroads due to plant operation at each site. Describe expected traffic routes, including but not limited to those for transport of ash to landfills.**
- **Describe any permanent changes required to existing roads, railroads, traffic signals, etc., as a result of this project at each site.**

Traffic associated with the Proposed Site will be routed, in order, through U.S. Interstate 43, U.S. Highway 14, Creek Road, and N Road. Traffic associated with the Alternative Site will be routed through U.S. Interstate 43, U.S. Highway 14, and Creek Road.

While existing roadways have the capacity to accommodate the increase in traffic volume associated with construction of the Project, vehicles entering and exiting the site may affect traffic flow and lead to temporary congestion. This congestion will be managed, minimized, or mitigated to the extent practicable. Prior to any large equipment or material deliveries, a Traffic Control Plan will be developed and reviewed with town, county, and/or WisDOT officials as appropriate. This plan will include temporary signage during construction, amongst other details, to facilitate traffic management.

Permits necessary for heavy or large loads will be acquired before deliveries begin. Certain oversized loads may require road repairs or modifications/reinforcements. Oversized loads will be planned and scheduled well in advance of shipping. Foundry Ridge will provide vehicle escort services, as needed. Foundry Ridge will obtain an Oversize-Overweight Vehicle Permit for any vehicle exceeding posted limits.

Foundry Ridge plans to negotiate an agreement with the Town of Darien and Walworth County to develop mutually acceptable provisions for road use, damage, and compensation. A draft Local Operating Contract is provided in Appendix P. Prior to the start of construction, Foundry Ridge will document the condition of local roads anticipated to be used by vehicles traveling to or from the Project. Foundry Ridge will assume responsibility for any required road improvements or damage caused by traffic associated with the construction of the Project.

No changes in railroad line usage or interference with existing railroad traffic is expected as no local railroad line crossings will be required by construction traffic.

Vehicle travel during operation is not expected to significantly impact the volume or frequency of road traffic in the area. While traffic associated with employees during operation is anticipated to be multidirectional, it will primarily utilize the roadways identified above.

7.12 Noise

7.12.1 For each site, provide existing and projected noise measurements as described in the PSC Noise Measurement Protocol and pre-construction consultations.

Hankard Environmental, Inc. prepared a Noise Analysis for the Project, which is provided in Appendix Q. The Noise Analysis consisted of identifying noise-sensitive receptors, measuring existing noise levels, and predicting noise levels for construction and operation of the Project. The Noise Analysis was carried out in accordance with the PSCW's Measurement Protocol for Sound and Vibration Assessment of Proposed and Existing Electric Power Plants. The Noise Analysis determined that under typical operating conditions, noise emissions from the Project at the Proposed Site are predicted to be less than 50 dBA (L_{eq}) and 75 dBC (L_{eq}) at all non-participating noise-sensitive receptors. The Noise Analysis determined that under typical operating conditions, noise emissions from the Project at the Alternative Site are predicted to be less than 50 dBA (L_{eq}) and 75 dBC (L_{eq}) at all non-participating noise-sensitive receptors except one (receptor 25), where predicted levels are 50 dBA (L_{eq}) and 77 dBC (L_{eq}).

7.12.2 Provide copies of any applicable local noise ordinances at each site.

The Town of Darien and Walworth County do not have noise ordinances applicable to natural gas electric generation facilities. In lieu of any state-wide limitations, Foundry Ridge established a target of 50 dBA (L_{eq}) and 75 dBC (L_{eq}) at all non-participating noise-sensitive receptors. This target is comparable to limitations followed by similar fossil fuel electric generating facilities.

7.12.3 Provide potential noise impacts of the following types of activities or equipment if applicable:

- **Fuel delivery train couplings when coal cars are being staged and moved for emptying.**
- **Fuel unloading either through bottom dump or rotary car dumper.**
- **Noise generated from different rail car types.**
- **Unloading, dumping, and loading of fuel delivery trucks and ash/waste removal trucks.**
- **Steam blows for plant start-up.**
- **Cooling tower operation.**
- **Air separation units or other generation unit components whose noise might dominate the plant site.**

No fuel will be delivered to the Facility by train or truck during operation. Dominant noise sources and their sound levels for the Project are provided in Appendix Q.

7.13 Odors

7.13.1 Identify any odors that may be perceptible outside the plant boundary during both construction and operation.

No odors are expected to be perceptible outside the Facility boundary during construction or operation.

7.14 Fogging and Icing

7.14.1 Provide an analysis of the potential for icing, fogging, and salt deposition due to operation of the proposed facility for each site, including specific location and

duration. Take into account each plume mitigation alternative being considered in the project application.

The Facility will use air-cooled auxiliary systems and no seawater or brackish water will be used. Icing, fogging, and salt deposition are typically associated with facilities that utilize wet cooling towers or significant water injection, neither of which are included in the Facility design. Given the dry cooling configuration, relatively short exhaust stacks (56 feet), and limited operating hours expected for the Facility, there will be no significant visible plume or moisture release that could result in atmospheric condensation, icing, or salt fallout.

7.14.2 Submit fogging probability maps, icing probability maps, $CaCO_3$ deposition probability maps, and plume length maps for each plume mitigation alternative being considered.

Fogging, icing, salt deposition, and visible plumes are typically associated with facilities that utilize wet cooling towers or significant water injection, neither of which are included in the Facility design. The inlet air evaporative cooling system does not pose a risk for fogging or icing. Therefore, plume formation and related environmental impacts are not expected to occur. Given the dry cooling configuration and absence of plume-producing equipment, no fogging probability maps, icing probability maps, $CaCO_3$ deposition probability maps, or plume length maps are necessary for the Facility.

7.14.3 Discuss and provide diagrams of any potential mitigation measures contemplated for decreasing fogging or deposition.

Icing, fogging, and salt deposition are not anticipated to occur during operation of the Facility. Therefore, no mitigation measures are proposed.

7.15 Residential and Urban Communities

7.15.1 Identify the distances from nearby residences to the proposed facilities' footprint and site boundary for each site.

The population concentration nearest to the Proposed and Alternative Sites is the Village of Darien, which is located approximately 2.3 miles from the Proposed Site and 0.19 miles from the Alternative Site.

The nearest residence to the Proposed Site is approximately 1,300 feet from the eastern boundary of the Site. There are 7 additional residences located within one-half mile of the Proposed Site.

The nearest residence to the Alternative Site is approximately 380 feet from the northeast corner of the Site. There are 6 additional residences located within one-half mile of the Alternative Site.

The Land Ownership Mapbook provided in Appendix A identifies the Proposed and Alternative Sites in relation to the nearest residences, schools, daycare centers, hospitals, nursing homes, places of worship, cemeteries, and other buildings.

7.15.2 Discuss anticipated impacts of the proposed plant at each site to residential/urban neighborhoods and communities such as noise, dust, duration of construction, time-of-day of construction, road congestion, impacts to driveways, etc.

7.15.3 Discuss how anticipated impacts would be mitigated.

Construction and operation of the Facility will increase ambient sound levels. Foundry Ridge incorporated several noise-reducing measures in the Facility design to mitigate impacts such as turbine stack silencers, acoustically lined hoods, acoustic barriers, selecting quiet equipment, implementing enclosures with interior sound-absorptive treatment, and strategic placement of noise-producing components. Please see Section 7.12 and Appendix Q for more information regarding noise impacts.

Earthmoving work, temporary road access, and other construction activities will create dust. Operation activities are not expected to generate significant amounts of dust. Foundry Ridge will implement dust control measures to suppress fugitive dust emissions. Those measures include:

- Implementing design to maintain compacted soil conditions or using aggregates to surface access roads, on-site roads, and parking lots;
- Strategically staging construction activities to limit the area of disturbed soils exposed at any given time, to the extent practicable; and
- Watering unpaved roads, disturbed areas (e.g. scraping, excavation, backfilling, grading and compacting), and loose materials, as needed.

Construction of the Project is planned to begin in Q3 2026 and be completed in Q1 2028, contingent on successful permitting, agency approvals, and other development and pre-construction activities. Table 5 identifies the preliminary construction schedule for the Project. Construction activities are anticipated to occur between the hours of 7 AM to 7 PM. Additionally, 24-hour work in multiple shifts will occur during critical activities that cannot be stopped to preserve quality or schedule when required (e.g. concrete pouring for foundations of heavy rotatory equipment, recovery of delays due to bad weather conditions), meeting all legal requirements according to federal and state regulations, including best safety measures and all applicable best industry practices and standards.

While existing roadways have the capacity to accommodate the increase in traffic volume associated with construction of the Project, vehicles entering and exiting the site may affect traffic flow and lead to temporary congestion. This congestion will be managed, minimized, or mitigated to the extent practicable. Prior to any large equipment or material deliveries, a Traffic Control Plan will be developed and reviewed with town, county, and/or WisDOT officials as appropriate. This plan will include temporary signage during construction, amongst other details, to facilitate traffic management. Vehicle travel during operation is not expected to significantly impact the volume or frequency of road traffic in the area.

Prior to the start of construction, Foundry Ridge will document the condition of local roads anticipated to be used by vehicles traveling to or from the Project. Foundry Ridge will assume responsibility for any required road improvements or damage caused by traffic associated with the construction of the Project. Construction and operation of the Project is not anticipated to impact existing driveways.

The Project will be visible from adjacent roads and introduce a new visual contrast. The Proposed and Alternative Sites are located near other developments and are not anticipated to significantly alter the aesthetics of the surrounding area. The Proposed Site is located on the site

of Darien Solar. The Alternative Site is located adjacent to a biosolid management facility and U.S. Interstate 43 separates the Site from the Village of Darien. Photo simulations for the Proposed and Alternative Sites are provided in Appendix K. An interactive web viewer corresponding to the photo simulations can be viewed at: https://foundry-ridge.truescape.com/.

Lighting will be used during construction and operation of the Project and create a new light source in the area. Construction lighting will be focused on work activities and not shine on neighboring property or oncoming traffic. Operation lighting will be shielded and directed downward to minimize visibility from adjacent properties and roads. Any floodlights necessary for the operation of the Facility will be angled inward, towards the Facility, and will have top and side shields. Please see Section 17.16.1 for more information regarding lighting.

The Facility will not cause any violation of the NAAQS or any PSD thresholds to be exceeded. Please see Section 6.11 for more information regarding air quality impacts.

7.15.4 Discuss the property value concerns that have been communicated to the applicant for each site.

Generalized property value concerns have been communicated to Foundry Ridge regarding the Project. The Project is not expected to have a negative impact to property values. Foundry Ridge will continue to address property value concerns on a case-by-case basis.

7.15.5 Discuss potential impacts to more regional communities that could result from river-related activities, air pollution, or other far-reaching effects of plant operation.

The Facility does not involve any river-related activities. The Facility will cause air emissions that negatively affect regional and global communities, but the Facility will not cause any violation of the NAAQS or any PSD thresholds to be exceeded. Please see Section 6.11 for more information on air quality impacts.

7.15.6 Discuss any concerns that groups or potentially impacted communities have raised.

Foundry Ridge proactively engaged environmental groups prior to submission of this Application to introduce the Project. Local officials and members of the public have inquired about the following matters:

- Land use and zoning;
- Governing body residing jurisdiction over the application approval process;
- Responsibility for maintenance and repair of roads used during construction;
- Temporary and permanent construction impacts;
- Emergency response needs;
- Source of construction and operations staff;
- Facility lighting;
- Local government and school tax impacts;
- Shared revenue utility aid;
- Wildlife impacts and recreational paths;
- Decommissioning;
- Site selection process;

- Property values;
- Noise impacts;
- Public safety and health;
- Project timeline; and
- Facility specifications.

Foundry Ridge is actively addressing these matters and if necessary, believes they can be effectively mitigated as described in this Application.

7.15.7 Locate and describe hospitals, schools, daycare facilities, and retirement homes within one half mile of each proposed site, or describe and locate the closest of each if one does not exist within a half mile.

There are no hospitals, schools, daycare facilities, or retirement homes located within one-half mile of the Proposed or Alternative Sites. Table 31 identifies the nearest hospital, school, daycare, and retirement home to both Sites.

Table 31 Nearest Community Facilities

Nearest Facility	Distance (miles) to Proposed Site	Distance (miles) to Alternative Site
Hospital – Mercyhealth Delavan	6.7	4.5
School – Darien Elementary School	3.1	1.2
Daycare Facility – CFS Head Start	5.1	2.9
Retirement Home – Ridgestone Village	5.9	3.7

The nearest hospital to the Proposed and Alternative Sites, Mercyhealth Delavan, is located on East Geneva Street in the City of Delavan. Mercyhealth Delavan provides family medicine, primary care, laboratory, and radiology services.

The nearest school, Darien Elementary School, is located on South Walworth Street in the Village of Darien. Darien Elementary School provides schooling for children from third to fourth grade.

The nearest day care facility, CFS Head Start, is located on Beloit Street in the City of Delevan. CFS Head Start provides early childhood education and development services to children and families in the Delavan community.

The nearest retirement home, Ridgestone Village, is located on South Second Street in the City of Delavan. Ridgestone Village is an assisted living facility that offers apartments with varying levels of care and facility services depending on the needs of individual residents.

7.16 Visual Impacts

Plant profiles and appearances

- **Provide the physical area and height dimensions for the plant components at each site. Submit diagrams and drawings to illustrate the power plant footprint and the heights of the plant components (e.g. boiler building, exhaust stack)**

- **Submit photo simulations of the project at each site for public-valued view sheds as discussed in pre-application meetings.**
- **Identify scenic roads within the project area(s) and discuss the potential impact of the project.**

Please see the Proposed and Alternative Site General Arrangement Schematics and Equipment Layout Schematics provided in Appendix A for detailed design information. Photo simulations of the Proposed and Alternative Sites and Gen-Tie Lines are provided in Appendix K. An interactive web viewer corresponding to the photo simulations can be viewed at: https://foundry-ridge.truescape.com/. No scenic roads are located within one mile of the Project Area. No impacts to scenic roads are anticipated.

7.16.1 Lighting

7.16.1.1 Describe each site lighting plan during project construction. Compare and contrast the intensity of the proposed lighting with the existing light regime in each site's neighborhood.

Foundry Ridge does not plan to utilize permanent lighting on-site during construction. The primary laydown area may have lights mounted to poles to support construction activities and security during non-daylight hours. During extended working hours, temporary light plants may be used in workspaces and laydown areas. Construction lighting will be focused on work activities and not shine on neighboring property or oncoming traffic.

FAA L-810 low-intensity steady-burning red obstruction lights may be installed at the top of the exhaust stacks, consistent with Federal Aviation Administration ("FAA") recommendations for voluntary lighting of structures below 200 feet. The change in lighting level in contrast to the surrounding areas is expected to be minimal and not highly noticeable to local residents.

7.16.1.2 Describe each site lighting plan for plant operation. Compare and contrast the intensity of the proposed lighting with the existing light regime in each site's neighborhood.

The Facility will require interior and exterior lighting for safety and security. Exterior lighting will be required in parking areas, on service roads, at pedestrian entrances to various buildings, and along walkways. Facility service roads, parking areas, and walkways will be illuminated with roadway lighting fixtures on poles. Building entrances will be illuminated with fixtures mounted directly above doors. Outdoor light fixtures will be shielded and directed downward to minimize visibility from adjacent properties and roads. Any floodlights necessary for the operation of the Facility will be angled inward, towards the Facility, and will have top and side shields. Low-emission light fixtures—sufficient to maintain minimum necessary brightness for safety and security measures—will be utilized where appropriate. To the extent practicable, security lighting will be turned on either by a local switch, as needed, or motion sensors triggered by movement. Operation areas within structures will have interior lighting necessary for personnel safety, which may be visible through windows or open doors. FAA L-810 low-intensity steady-burning red obstruction lights may be installed at the top of the exhaust stacks, consistent with FAA recommendations for voluntary lighting of structures below 200 feet. The

change in lighting level in contrast to the surrounding areas is expected to be minimal and not highly noticeable to local residents.

7.16.1.3 Describe the potential impacts of each site's lighting on adjacent land uses.

Lighting at the Proposed and Alternative Sites is not anticipated to significantly impact adjacent land uses. The Facility will implement lighting techniques that reduce off-site lighting impacts, glare, skyglow, and will direct lighting away from any surrounding residential properties. Existing vegetation and obstructions will partially—and potentially in some cases, entirely—obscure the view of the Facility from nearby residences.

7.16.1.4 Provide copies of any applicable local ordinances that relate to the proposed lighting plans.

Walworth County Zoning Ordinance Section 74-96 Glare and Heat, provided in Appendix M, requires that no activity emit glare or heat that is visible or measurable at the boundaries of the lot on which the principal use is located. It further states exposed sources of light shall be shielded so as not to be visible outside their premises. The Town of Darien does not have a lighting ordinance that is applicable to the Project.

7.17 Parks and Recreation Areas

7.17.1 Identify any parks and recreation areas or trails that may be impacted by the proposed project at each site, and the owner/manager of each recreation resource.

The Turtle Creek Wildlife Area, managed by WDNR, is located 0.72 miles west of the Proposed Site and directly north of the Alternative Site. The Turtle Creek Wildlife Area is a 1,035-acre property located in western Walworth and eastern Rock counties that follows 10 miles of Turtle Creek and provides 10 road crossings or parking lots. There is a parking lot and access point located directly across Creek Road from the Alternative Site. The parking lot connects to a linear walking trail, approximately 1,990 feet in length, which provides access to the larger, primary portion of the Wildlife Area. The two nearest parking lots to the Creek Road parking lot location are on Highway 89, approximately 1.51 miles to the northwest by road, and on School Section Road, approximately 1.92 miles to the north by road.

7.17.2 Provide any communications with these owners/managers.

On January 15, 2025, Foundry Ridge representatives met with PSC and WDNR staff for the Project's Pre-Application Meeting. On July 17, 2025, Foundry Ridge representatives held a consultation with WDNR and USFWS staff. In these meetings, Foundry Ridge representatives discussed Project plans, surveys, siting, BMPs, and special status species. Copies of all official correspondence between Foundry Ridge and WDNR is provided in Appendix F.

7.17.3 Discuss how short- and long-term impacts to these resources will be avoided and minimized, including access.

The Project will not have any long-term impact to the Turtle Creek Wildlife Area. Potential short-term impacts may include increased traffic on nearby roads, fugitive dust, and noise. Access to the Turtle Creek Wildlife Area parking lot across from the Alternative Site may be temporarily impeded by construction traffic. The two nearest parking lots to the Creek Road

parking lot location are on Highway 89, approximately 1.51 miles to the northwest by road, and on School Section Road, approximately 1.92 miles to the north by road. Periods associated with peak use of the Wildlife Area are not anticipated to coincide with periods of high Project-related traffic. Please see Section 7.15.3 for information regarding traffic control, dust control, and noise mitigation measures.

7.18 Airports

7.18.1 Identify the location of all private and public airports/airstrips near each site and connecting facility.

The Airport Map provided in Appendix A identifies the location of private and public airports/airstrips near the Project. The nearest private airstrip to the Project is the Ames Private Airport, located approximately 2.30 miles northwest of the Proposed Site and 2.50 miles northwest of the Alternative Site. The nearest public use airport to the Project is the Lake Lawn Airport, located approximately 8.21 miles northeast of the Proposed Site and 5.97 miles northeast of the Alternative Site. Table 32 identifies all private and public airports, airstrips, and helipads within 10 miles of the Project Area.

Table 32 Airports

Facility Name	Airport ID	Distance to Project Area (miles)	Ownership	Runway Information
Ames Private Airport	05WI	2.30	Private	One turf runway, private uses
Barten Airport	WS55	6.64	Private	One turf runway, private uses
Big Foot Airfield Airport	7V3	6.87	Privately-owned, public airport	One turf runway, general aviation uses
Big Foot Farms Heliport	WS73	9.64	Private	One helipad, private uses
Bountiful Acres Airport	6WI3	5.73	Private	One turf runway, private uses
Hacklander Farms Airport	76WN	6.93	Private	One turf runway, private uses
Johnstown Center Airport	WI84	6.04	Private	One turf runway, private uses
Lake Lawn Airport	C59	5.97	Privately-owned, public airport	One paved runway, general aviation uses
Lee Creek Airport	56IL	9.99	Private	One paved runway, private uses

Facility Name	Airport ID	Distance to Project Area (miles)	Ownership	Runway Information
Melin Farms Airport	3WI6	5.75	Private	One turf runway, private uses
Pine Hill Airport	09LL	9.70	Private	One turf runway, private uses
Swan Airport	WI70	7.42	Private	One turf runway, private uses

7.18.2 Describe the airports/airstrips, their runways (length, orientation), and type of use.

The Ames Private Airport, Barten Airport, Big Foot Airfield Airport, Bountiful Acres Airport, Hacklander Farms Airport, Johnston Center Airport, Lee Creek Airport, Melin Farms Airport, Pine Hill Airport, and Swan Airport are private use airstrips without any permanent runways. The Bigfoot Farms Heliport is an asphalt helipad for private use. The Lake Lawn Airport has one asphalt runway, a wind indicator, and tiedowns for parking. Runway 18/36 is oriented north to south and is 4,423 feet long by 80 feet wide. The Lake Lawn Airport is open to public use.

7.18.3 Describe any potential for impact to aircraft safety and intrusion into navigable airspace (runway approaches).

The Project will not have any structures taller than 200 feet, nor structures that exceed a 100:1 slope within 20,000 feet of a public use airport runway (longest runway greater than 3,200 feet in length), 50:1 slope within 10,000 feet of a public use airport runway (longest runway less than 3,200 feet in length), or 25:1 slope within 5,000 feet of a public use heliport landing area. The Project will not intrude into navigable airspace. Foundry Ridge supplied Facility exhaust stack and Gen-Tie Line structure locations and height specifications to the FAA's Obstruction Evaluation/Airport Airspace Analysis Pre-Screening Tool and received a determination that filing a Notice of Proposed Construction or Alteration is not required. Foundry Ridge does not expect the Project to impact aircraft safety.

7.18.4 Identify potential construction limitations and permit issues.

No construction limits and permit issues related to structure height and airspace are anticipated.

7.18.5 Provide documentation of consultation with the WisDOT Bureau of Aeronautics and the FAA.

Copies of all official correspondence between Foundry Ridge and the FAA is provided in Appendix F. No Project facilities will require a High Structure Permit from the WisDOT Bureau of Aeronautics.

7.19 Communication Towers

7.19.1 Discuss any potential interference to the function of communication towers within the project area by the proposed project.

7.19.2 Provide GIS location information for communications facilities evaluated in section 6.19.1. Include in the GIS information the communications technologies used for each facility.

No Federal Communications Commission ("FCC") land private mobile towers, cellular towers, or microwave towers exist within 0.5 miles of the Project Area. Based on the location and physical dimensions of Project facilities, no impact on the function of communication towers is anticipated due to construction or operation of the Project.

8. Waterway/Wetland Permitting Activities

This section covers information required by DNR for wetland and waterway permits. The following subsections apply to all proposed project sites or routes. These sections should be consistent with the wetlands and waterways included in DNR Tables 1 and 2 and associated wetland and waterway maps. See the Wetlands and Waterways section of the Introduction portion of this document on what to include in DNR Tables 1 and 2 regarding waterway resources. Questions about this section should be directed to DNR Office of Energy's Energy Project Liaison staff.

8.1 Waterway Activities

This section should be consistent with the waterways included in DNR Tables 1 and 2 and associated maps. This section should apply to the proposed and alternative sites/routes (if applicable) and their associated facilities (for example, off-ROW access roads, staging areas, permanent structures, new substations and/or expansion of existing substations (including associated driveways and permanent stormwater management features to be constructed).

8.1.1 Identify the number of waterways present, including DNR-mapped waterways and additional field identified waterways. Also identify the number of times the waterway meanders in and out of the project area and indicate the number of waterway crossings.

According to the WDNR's Surface Water Data Viewer, there are no waterways within the Proposed or Alternative Site Properties and Gen-Tie Lines or within 500 feet of the Properties (WDNR 2025). A delineation of wetlands and waters was completed on July 1st, 2025, which verified the absence of waterways within the Proposed and Alternative Site Properties and Gen-Tie Lines. Full methodology and results of the field delineation are provided in the Wetland and Water Resources Report in Appendix R. There are no waterway crossings planned for the Project.

8.1.2 Identify any waterways in the project route(s) that are classified as Outstanding or Exceptional Resource Waters, Trout Streams, Wild Rice Waters, and/or Wild or Scenic Rivers.

There are no waterways identified in the Proposed or Alternative Site Properties or associated Gen-Tie Line rights-of-ways ("ROW"s).

8.1.3 State if you are requesting DNR staff perform a navigability determination on any of the DNR mapped waterways and/or field identified waterways that will be impacted and/or crossed by project activities. If a navigability determination is requested, provide the following information in a separate appendix with the application filing:

Foundry Ridge is not requesting WDNR staff perform a navigability determination on any WDNR mapped waterways and/or field determined waterways.

8.1.4 Provide the following information:

- **How many waterway crossings are proposed to be traversed with equipment and how that crossing will be accomplished (i.e. placement of temporary clear span bridges (TCSB), use of existing bridge or culvert, driving on the bed, etc.).**

No waterway crossings are anticipated to be traversed with equipment.

- **How many structures are proposed to be placed below the ordinary high-water mark (OHWM) of a waterway. Indicate if structures are temporary or permanent.**

No structures are anticipated to be placed below the ordinary high-water mark ("OHWM") of a waterway.

- **Indicate if any other waterways would be impacted and/or crossed by other construction activities regulated under Chapter 30 Wis. Stats. (i.e. placement of a new storm water pond within 500 feet of a waterway, stream relocation, staging areas, placement of riprap, etc.).**

No stormwater retention ponds are anticipated to be constructed within 500 feet of a waterway, and therefore no waterways would be impacted under Chapter 30 Wis. Stats.

- **For underground installation only: Indicate the amount of waterway crossings via underground installation and specify the installation method (i.e. X waterways will be bored, Y waterways will be trenched, etc.)**

No waterway crossings are planned via underground installation.

- **Provide the methods to be used for avoiding, minimizing, and mitigating construction impacts in and near waterways. This discussion should include, but not be limited to, avoiding waterways, installation methods (i.e. directional bore versus open-cut trenching or plowing), equipment crossing methods (i.e. for temporary access, the use of TCSB versus temporary culvert; for permanent access, the use of permanent bridge versus permanent culvert), sediment and erosion controls, invasive species protocols for equipment, etc.**

Impacts to waterways have been avoided by siting Project facilities and temporary disturbance areas in upland areas which do not contain mapped or field verified waterbodies. An ECSWMP will be completed to document compliance with Wis. Admin. Code § NR 216 and Wis. Admin. Code § NR 151.

- **For waterways that will be open-cut trenched, provide the following:**
  - **State if any waterways are wider than 35 feet (measured from OHWM to OHWM).**
  - **The machinery to be used, and where it will operate from (i.e. from the banks, in the waterway channel) and if a TCSB is needed to access both banks.**
  - **The size of the trench (length, width, and depth) for each waterway crossing.**
  - **Details on the proposed in-water work zone isolation/stream flow bypass system (i.e. dam and pump, dam and flume, etc.).**
  - **Duration and timing of the in-stream work, including the installation and removal of the isolation/bypass system and the trenching activity.**
  - **How impacts to the waterway will be minimized during in-water work (i.e. energy dissipation, sediment controls, gradually releasing dams, screened and floating pumps, etc.).**
  - **How the waterway bed and banks will be restored to pre-existing conditions.**

No waterways will be open-cut trenched to facilitate construction of the Project.

8.1.5 For waterways that will be directionally bored, provide the following:

- **The location and size of any temporary staging and equipment storage.**
- **The location and size of bore pits and their distance from waterways.**
- **Provide a contingency plan for bore refusal and a plan for the containment and clean-up of any inadvertent releases of drilling fluid (e.g. a frac-out).**

No waterways will be directionally bored to facilitate construction of the Project.

8.1.6 For waterways that will have a TCSB installed across them, provide the following:

- **Description of the TCSB proposed, including dimensions, materials, and approaches. Verify the TCSB will completely span the waterway.**
- **State if any waterways are wider than 35 feet (measured from OHWM to OHWM), and/or if any in-stream supports will be used.**
- **State how the TCSB placement and removal will occur (i.e. carried in and placed with equipment, assembled on site, etc.) and if any disturbance would occur to the bed or banks for the installation and removal, including bank grading or cutting.**
- **Duration of the placement of the TCSB.**
- **Sediment controls that will be installed during the installation, use, and removal of the TCSB's.**
- **How the TCSB's will be inspected during use and how they will be anchored to prevent them from being transported downstream.**

- **State if the required 5-foot clearance will be maintained, or if the standards in NR 320.04(3), Wis. Adm. Code will be complied with.**
- **How the waterway bed and banks will be restored when the TCSB is removed.**
- **Describe the proposed area of land disturbance and vegetation removal at waterway crossings. Include a description of the type of vegetation to be removed (e.g. shrub, forest), and if this vegetation removal will be temporary (allowed to regrow) or permanent (maintained as cleared).**
- **If any of the following activities are proposed, provide the information as detailed on the applicable permit checklist:**
  - **New culvert placement:**
  - **https://dnr.wi.gov/topic/waterways/documents/PermitDocs/GPs /GP-CulvertWPEDesign.pdf**
  - **https://dnr.wi.gov/topic/Waterways/documents/PermitDocs/IPs /IP-culvert.pdf (General Permit) or (Individual Permit).**
  - **New permanent bridge placement:**
  - **https://dnr.wi.gov/topic/waterways/documents/PermitDocs/GPs /GP-ClearSpanBridge.pdf**
  - **https://dnr.wi.gov/topic/Waterways/documents/PermitDocs/IPs /IP-bridgeTempCross.pdf (General Permit, no in-stream supports) or (Individual Permit, in-stream supports).**
  - **New storm water pond placed within 500 feet of a waterway:**
  - **https://dnr.wi.gov/topic/waterways/documents/PermitDocs/GPs /GP-StormwaterPond.pdf.**

No waterways will have a temporary clear span bridge ("TCSB") installed across them to facilitate construction of the Project.

8.2 Wetland Activities

This section should be consistent with the waterways included in DNR Tables 1 and 2 and associated maps. This section should apply to the proposed and alternative sites/routes (if applicable) and their associated facilities (for example, off-ROW access roads, staging areas, permanent structures, new substations and/or expansion of existing substations (including associated driveways and permanent stormwater management features to be constructed).

8.2.1 Describe the method(s) used to identify wetland presence and boundaries within the project area (i.e. wetland field delineation, wetland field determination, conservative desktop review, etc.). If conservative desktop review was the only method used to identify the presence of wetlands, state if any areas will be field-verified (and when). If a combination of methods were used, describe which project areas utilized which method. The associated delineation report and/or desktop review documentation should be uploaded to the PSC's website as part of the application filing.

A field wetland delineation was completed on July 1, 2025, to identify wetlands in the Proposed and Alternative Site Properties and associated Gen-Tie Line ROWs as shown in the Wetland and Waterway Identification Methods Map in Appendix A. The wetland delineation was conducted

in accordance with the U.S. Army Corps of Engineers ("USACE") "Routine Determination, Onsite Inspection Necessary" method outlined in the 1987 Corps of Engineers Wetlands Delineation Manual (USACE 1987) and the Northcentral and Northeast Regional Supplement: Version 2.0 (USACE 2012). This process included an offsite review which evaluated characteristics indicating the presence of wetlands to identify potential wetland areas. The onsite review focused on those identified potential wetland areas as well as other low-lying and/or wet areas not identified during the offsite review. An approximately 6-acre area along the Alternative Gen-Tie Line which did not have field access had a thorough desktop review completed along with visual review from adjacent roadsides on July 1, 2025 to verify the presence or absence of wetland features. The field delineated resources are shown in the Wetland and Waterway Crossings Aerial Mapbook (Appendix A) and included in WDNR Table 2 (Appendix R). Full methodology and results of the field wetland delineation are provided in the Wetland and Water Resources Report in Appendix R.

8.2.2 Identify the number of wetlands present and by wetland type, using the Eggers and Reed classification. Provide as an overall project total, as well as broken down by the proposed site and the alternative site(s) (if applicable) and their associated facilities.

Three wetlands were identified on the Proposed Site Property, two of which were classified as shallow marsh and one as wet meadow. One wetland within the Proposed Site Property also intersects the Proposed Gen-Tie Line ROW. A summary of the three wetlands is provided in WDNR Table 2 (Appendix R) and shown in the Wetland and Waterway Crossings Aerial Mapbook (Appendix A).

The identified wetlands were incidentally created as a result of recent disturbance on the Property associated with the construction of facilities for Darien Solar. These wetlands were not identified in the previous delineation conducted for the Proposed Site Property completed in October 2019 and did not appear as signatures in the historical aerial photography review for the site. Foundry Ridge believes these wetlands are artificial and therefore not regulated under Wis. Admin. Code § 281.36 (4n). Foundry Ridge is preparing an Artificial Wetland Exemption Request to be submitted to the WDNR and will supplement the Application with this information once a determination has been made by the WDNR.

No wetlands were identified on the Alternative Site Property or within the Alternative Gen-Tie Line ROW.

8.2.3 Wetland functional values:

8.2.3.1 Discuss the existing functional values of the wetland present. Functional values include but are not limited to floristic diversity, fish and wildlife habitat, flood storage, water quality, groundwater discharge and recharge, public use, etc.

The functional values of wetlands identified are very low as the wetlands were incidentally created in upland areas as a result of site disturbance and grading for construction of facilities for Darien Solar. Vegetative communities are dominated by invasive species such as cattail and reed canary grass.

8.2.3.2 Discuss how the project may impact existing functional values of wetlands.

The functional values of wetlands identified are very low as the wetlands were incidentally created in upland areas as a result of site disturbance and grading for construction of facilities for the Darien Solar. Vegetative communities are dominated by invasive species such as cattail and reed canary grass and soils on site showed disturbance from construction activities. As such, the Project is not anticipated to materially decrease the existing functional values of wetlands.

8.2.3.3 Provide Wisconsin Rapid Assessment Methodology (WRAM) forms, or other assessment methodology documentation, if completed.

No Wisconsin Rapid Assessment Methodology forms or other assessment methodology were completed for the identified wetlands.

8.2.4 Identify any wetlands in the project area that are considered sensitive and/or high-quality wetlands, including, but not limited to:

- **Any wetlands in or adjacent to an area of special natural resource interest (ASNRI) (NR 103.04, Wis. Adm. Code).**

No wetlands were identified in or adjacent to an area of special natural resource interest.

- **Any of the following types: deep marsh, northern or southern sedge meadow not dominated by reed canary grass, wet or wet-mesic prairie not dominated by reed canary grass, fresh wet meadows not dominated by reed canary grass, coastal marsh, interdunal or ridge and swale complex, wild rice-dominated emergent aquatic, open bog, bog relict, muskeg, floodplain forest, and ephemeral ponds in wooded settings.**

No wetlands of the aforementioned types were identified. The wet meadow identified in the Proposed Site Property is dominated by reed canary grass.

- **Any wetlands with high functional values based on factors such as abundance of native species and/or rare species, wildlife habitat, hydrology functions, etc.**

No wetlands with high functional values were identified.

- **Provide the following:**
  - **The number of wetlands that would have construction matting placed within them to facilitate vehicle access and operation and/or material storage. Provide the total amount of wetland matting, in square feet.**

No temporary construction matting is proposed in wetlands.

- **The number of structures that would be constructed within wetlands. Indicate if structures are temporary or permanent. Provide the total square footage of permanent and temporary wetland impact for the placement of structures.**

Two wetlands on the Proposed Site Property will be impacted by the Project. Wetland WB-01 will be impacted by construction of the Facility footprint. Wetland WB-02 will be impacted by the construction of a temporary parking/laydown area that will be removed when construction activities are complete. Foundry Ridge is preparing an Artificial Wetland Exemption Request and believes these wetlands should be considered exempt under Wis. Admin. Code § 281.36 (4n); therefore, impact calculations were not included in WDNR Table 1 (Appendix R).

- **How many wetlands will have permanent fill placed within them. Provide the total amount of permanent wetland fill, in square feet.**

Two wetlands on the Proposed Site Property will be impacted by the Project. Wetland WB-01 will be impacted by construction of the Facility footprint. Wetland WB-02 will be impacted by the construction of a temporary parking/laydown area that will be removed when construction activities are complete. Foundry Ridge is preparing an Artificial Wetland Exemption Request and believes these wetlands should be considered exempt under Wis. Admin. Code § 281.36 (4n); therefore, impact calculations were not included in WDNR Table 1 (Appendix R).

- **How many shrub and/or forested wetlands would be cleared for construction. Provide the total amount of shrub and/or forested wetland conversion, in square feet.**

No shrub or forested wetlands were identified.

- **How many wetlands will be impacted and/or crossed by other construction activities regulated under 281.36 Wis. Stats. (i.e. road building activities such as grading and cutting, substation upgrades, new tie-ins, vehicle/equipment access across wetland resulting in soil mixing or soil rutting, etc.).**

Two wetlands on the Proposed Site Property will be impacted by the Project. Wetland WB-01 will be impacted by construction of the Facility footprint. Wetland WB-02 will be impacted by the construction of a temporary parking/laydown area that will be removed when construction activities are complete. Foundry Ridge is preparing an Artificial Wetland Exemption Request and believes these wetlands should be considered exempt under Wis. Admin. Code § 281.36 (4n); therefore, impact calculations were not included in WDNR Table 1 (Appendix R).

- **For underground installation only: how many wetlands will be crossed by collection lines and specify the installation method (i.e. X wetlands will be bored, Y wetlands will be trenched, etc.).**

No underground installation of collection lines are proposed in wetlands.

- **Describe the sequencing of matting placement in wetlands and the anticipated duration of matting placement in wetlands. For matting placed in any wetland for longer than 60 consecutive days during the growing season, prepare and submit a wetland matting restoration plan with the application filing.**

No matting placement will occur in wetlands to facilitate construction of the Project.

8.2.5 For wetlands that will be open-cut trenched, provide the following:

- **Provide details on the total disturbance area in wetland, including how total wetland disturbance was calculated. Include the size of the trench (length, width, and depth), where stockpiled soils will be placed (i.e. in upland, in wetlands on construction mats, etc.), and where equipment will operate.**
- **Provide details on the proposed trench dewatering, including the method(s) that may be used (pumps, high-capacity wells, etc.), how discharge will be treated, and where the dewatering structure will be located.**
- **Duration and timing of the work in wetlands.**
- **How the wetlands will be restored to pre-existing conditions.**
- **For wetlands that will be directionally bored, provide the following:**
- **How bored wetlands and associated bore pits will be accessed.**
- **The location and size of any temporary staging and equipment storage.**
- **The location and size of bore pits and the distance from wetlands.**
- **Provide a contingency plan for bore refusal and a plan for the containment and clean-up of any inadvertent releases of drilling fluid (e.g. a frac-out).**
- **For wetlands that will be plowed, resulting in a discharge of fill (soil mixing and/or soil rutting), provide the following:**
- **Provide details on the total disturbance area in wetland, including how total wetland disturbance was calculated.**
- **Duration and timing of the work in wetlands.**
- **How the wetlands will be restored to pre-existing conditions.**
- **Plowing through saturated or wet/soggy wetlands would likely result in soil mixing and rutting, and thus the plowing would then be 281.36 Wis. Stats. regulated activity.**

No wetlands will be open-cut trenched to facilitate construction of the Project.

8.2.6 For wetlands that will be crossed/accessed by vehicle/equipment resulting in a discharge of fill (soil mixing and/or soil rutting), provide the following:

- **Provide details on the total disturbance area in wetland, including how total wetland disturbance was calculated.**
- **Duration and timing of the work in wetlands.**
- **How the wetlands will be restored to pre-existing conditions.**
  - **Note: Vehicle/equipment access through saturated or wet/soggy wetlands would likely result in soil mixing and rutting, and thus the plowing would then be 281.36 Wis. Stats. regulated activity.**

No wetlands will be crossed/accessed by vehicles/equipment resulting in a discharge of fill for construction of the Project.

8.2.7 For wetland vegetation that will be cleared or cut for construction, provide the following:

- **Justification for why wetland trees and shrubs are proposed to be cleared, and what construction activity the clearing is associated with (e.g. transmission line installation, off-ROW access road, staging area, etc.).**
- **The timing and duration of vegetation removal.**
- **Describe the type of equipment that will be used, and if the vegetation removal will result in soil disturbance, including rutting and soil mixing.**
- **The type of wetland and type of vegetation to be cleared.**
- **State if tree and shrubs that are removed will be allowed to regrow or be replanted, or if cleared areas will be kept free of trees and shrubs long-term.**
- **Indicate the plan for handling and disposing of the debris (brush piles, tree trunks, wood chips, etc.) resulting from vegetation clearing in wetlands. State if debris would be removed from all wetlands to be cleared and disposed of in upland or other non-wetland locations.**
- **If debris is not proposed to be removed from all wetlands during clearing, explain why disposal in non-wetland areas is not feasible.**
- **If debris is not proposed to be removed from all wetlands during clearing, state how debris left in wetland will not restrict re-vegetation growth, will not alter surface elevations, and will not obstruct water flow. If wood chips will be placed in wetlands, state the depth (in inches) proposed. If debris is not proposed to be removed from all wetlands during clearing, state how these wetlands will be monitored to ensure re-vegetation growth, surface elevations, and water flow are not impacted, and that the proposed depth of chip cover is adhered to. If re-vegetation growth becomes impeded, surface elevations become altered, and/or water flow becomes obstructed from wood chip placement, state how these impacts will be addressed and corrected, if they should occur.**

No trees or shrubs will be removed from wetlands for construction of the Project and no debris will be placed in wetlands.

8.2.8 Provide the methods to be used for avoiding, minimizing, and mitigating construction impacts in and near wetlands. This discussion should include, but is not limited to, how wetland impact was first avoided then minimized by shifting the project boundary, relocating structures and/or fill outside of wetland, minimizing construction ROW through wetland, by installation methods (i.e. directional bore versus open-cut trenching, soil segregation during trenching, etc.), equipment crossing methods (i.e. use of construction matting, frozen ground conditions, etc.), sediment and erosion controls, invasive species protocols for equipment, etc.

Foundry Ridge is preparing an Artificial Wetland Exemption Request and believes wetlands proposed to be impacted by construction should be considered exempt under Wis. Admin. Code § 281.36 (4n) as they were incidentally created as a part of the construction of Darien Solar. Impacts to naturally occurring wetlands have been completely avoided by Project siting and design. Indirect impacts to wetlands adjacent to but ultimately outside of the Proposed and Alternative Properties and Gen-Tie Lines will be minimized by installing appropriate erosion and sediment control measures.

8.2.9 Indicate if an environmental monitor will be employed during project construction and restoration activities. If so, describe the monitors roles and responsibilities, frequency of visits, etc.

Foundry Ridge does not intend to bring on an environmental monitor specifically for construction and restoration activities associated with wetlands as wetlands identified on the Proposed Site Property are being considered artificial with a pending request to the WDNR.

8.2.10 Describe how all wetlands within the project area will be restored. This discussion should include details on the seeding plan, maintenance, and monitoring, restoring elevations and soil profiles, restoring wetland hydrology, etc.

No restoration of wetlands is proposed as Foundry Ridge believes wetlands impacted by construction should be considered exempt under Wis. Admin. Code § 281.36 (4n) as the wetlands were incidentally created as a result of the construction of Darien Solar.

8.3 Mapping Wetland and Waterway Locations, Impacts, and Crossings.

Provide the following map sets, as described below, for each proposed and alternative sites/routes (if applicable) and their associated components. Each map set should include an overview or index page that includes page extents for the corresponding smaller-scale map pages within the remainder of the map set. The smaller-scale map pages should show the project and resources in greater detail, include pages numbers to reference to the overview page, and have consistent scales throughout the pages.

Aerial Map Imagery showing the following:

- **Delineated wetlands, labeled with the feature unique ID,**
- **Wisconsin Wetland Inventory ("Mapped Wetlands" SWDV layer) and hydric soils ("Wetland Indicators & Soils" SWDV layer), if a delineation was not conducted,**
- **DNR-mapped waterways, labeled with the feature unique ID,**
- **Field identified waterways, labeled with the feature unique ID,**
- **Vehicle crossing method of waterways for both permanent and temporary access, labeled by the crossing method (i.e. TCSB, installation of culvert, installation of bridge, installation of ford, use of existing culvert, use of existing bridge, use of existing ford, driving on the bed),**
- **ROW,**
- **Locations of temporary and permanent structures,**
- **Transmission line route,**
- **Segment names and nodes,**
- **Access paths (both on and off-ROW). Off-ROW access roads should be labeled with an identifying name or number,**
- **Staging areas, laydowns, and any temporary workspaces, such as crane pads (labeled with identifying name or number),**

- **Footprint of new substations and/or footprint of existing substations to be expanded, and associated driveways and permanent storm water management features to be built (ponds, swales, etc.),**
- **Placement of construction matting in wetlands,**
- **Underground line installation only: symbolize the line route to indicate installation method (directional bore, open-cut trench, plow etc.). This includes the excavation areas in wetlands (i.e. bore pits, open-cut trench, etc.), and;**
- **Locations of any other waterway or wetland impacting activity regulated under Wis. Stats. Chapter 30 and 281.36.**

A map showing which method(s) were used to identify wetland presence and boundaries within the project area (i.e. wetland field delineation, wetland field determination, conservative desktop review).

Please see the Wetland and Waterway Crossings Aerial Mapbook and Wetland and Waterway Identification Methods Map in Appendix A.

9. Endangered, Threatened, Special Concern Species, and Natural Communities

In the Introduction, page ii of this document, additional details are provided on how to perform an Endangered Resources (ER) screening and about performing habitat assessments, if required.

9.1 Provide a copy of the completed ER screening and all supporting materials for all project areas, including all applicable components such as off-ROW access routes, staging areas, new substations, and expansion of existing substations.

An Endangered Resource Review ("ERR") Project Area was completed on July 2, 2025 (ERR #25-216) and is provided in Appendix S. The ERR identified no species with required actions and two species with recommended actions including the Bald Eagle and the special concern plant [redacted]

A USFWS's Information for Planning and Consultation ("IPaC") database search was completed on June 16, 2025, to identify any federally listed species with the potential to occur within the Project Area and is provided in Appendix S. The IPaC identified the experimental population of the Whooping Crane (*Grus americana*), the threatened Eastern Massasauga (*Sistrurus catenatus*) and Eastern Prairie Fringed Orchid (*Platanthera leucophaea*), and the proposed threatened Monarch Butterfly (*Danaus plexippus*) and Western Regal Fritillary (*Argynnis idalia occidentalis*). The Project Area may provide stopover habitat for the Whooping Crane, but impacts are not anticipated, and regulatory restrictions are reduced for non-essential experimental populations. The Project Area is currently used for electric generation, row crop agriculture, and contains developed land and therefore does not provide suitable habitat for currently listed species.

9.2 Submit results from habitat assessments and biological surveys for the proposed project, if completed or if required to be completed per the ER screening. If surveys or assessments are required to be completed prior to construction but have not yet been completed, state when these surveys will be completed. Results from additional surveys conducted during the review of the application, prior to the start of construction, and/or post-construction must be submitted as they are completed.

No habitat assessments or biological surveys are required or planned to be completed.

9.3 For all project facilities and areas impacted by construction, discuss potential impacts to rare species as identified in the completed ER screening and/or field assessments.

No impacts to rare species identified by the ERR screening or IPaC species list are expected to occur from construction of the Project.

9.3.1 For any required follow-up actions that must be taken to comply with endangered species law, discuss how each required action would affect the proposed project, and how the required action would be complied with.

No WDNR required actions were identified in the ERR.

9.3.2 For any recommended follow-up actions to help conserve Wisconsin's rare species and natural communities, discuss if and how any recommended actions would be incorporated into the proposed project.

A Bald Eagle nest has been recorded within one mile of the area reviewed therefore the WDNR recommends, according to the USFWS guidelines, that human activity be avoided from January 15 to July 30 within 660 feet of an active bald eagle nest. The known nest location is greater than 660 feet from the Project Area, therefore Foundry Ridge plans to incorporate this action into the Project.

9.3.3 If any recommended follow-up actions are not planned to be incorporated into project construction or operation, state the reasons why.

The WDNR recommends conducting site surveys to determine the presence or absence of the special concern species [redacted], or alternatively, scheduling work during the [redacted] dormant season [redacted] if suitable habitat may be affected. Suitable habitat includes [redacted], although the species has also naturalized along [redacted]. The Proposed and Alternative Site Properties do not contain suitable habitat for this species. Additionally, disturbance to [redacted] where the species can be found will be minimal. Based on these conditions, Foundry Ridge does not plan to implement the recommended survey or seasonal restrictions for this special concern species.

9.3.4 Provide communications with DNR and U.S. Fish and Wildlife Service, as applicable.

The WDNR ERR and USFWS IPaC species list are provided in Appendix S. Foundry Ridge held a consultation meeting with WDNR and USFWS to discuss Project plans and special status species on July 17, 2025. The presentation from this meeting is provided in Appendix F.

10. DNR Information regarding Erosion Control and Storm Water Management Plans (not PSC requirements).

This section serves as guidance for development of Erosion Control and Stormwater Management Plans associated with DNR NR 216 Permits. These are not requirements for a PSC CPCN or CA.

10.1 Erosion Control and Storm Water Management Plans

10.1.1 DNR requires a detailed description of temporary and permanent erosion and sediment control measures to be utilized during and after construction of the project.

10.1.2 If the project would involve one or more acres of land disturbance, the applicant's request for permits under Wis. Stat. § 30.025 must identify the need for coverage under the Construction Site Storm Water Runoff General Permit [PDF] from DNR. The permit application itself must be submitted through DNR's electronic Water Permits system after the PSC order. This permit may also authorize construction site dewatering discharges under certain conditions.

10.1.3 The Storm Water Permit and Wis. Admin. Code ch. NR 216 require a site-specific Erosion Control Plan, Site Map, and Storm Water Management Plan. The permittee would be required to implement and maintain, as appropriate, all erosion and sediment control practices identified in the plans from the start of land disturbance until final stabilization of the site. Final stabilization means that all land-disturbing construction activities at the construction site have been completed and that a uniform perennial vegetative cover has been established with a density of at least 70 percent of the cover for the unpaved areas and areas not covered by permanent structures or equivalent stabilization measures.

10.1.4 The Erosion Control Plan, Site Map, Storm Water Management Plan, and any supporting documentation (such as modeling input/output, design specifications, geotech/soil report, site photos, etc.) must be submitted with the Storm Water Permit application through the DNR's ePermitting system.

10.2 Erosion Control Plan- See Wis. Admin. Code § NR 216.46 for details regarding information required in the Erosion Control Plan as part of a complete permit application. Sections include:

- **Site-specific plans.**
- **Compliance with construction performance standards in Wis. Admin. Code § NR 151.11.**
- **Details about the site and the project.**
- **List and schedule of construction activities.**
- **Site map(s) with site, project, and erosion and sediment control details.**
- **Description of temporary and permanent erosion and sediment controls.**
- **Compliance with material management, velocity dissipation, and inspection schedule requirements.**

10.3 Storm Water Management Plan– See Wis. Admin. Code § NR 216.47 for details regarding information required in the Storm Water Management Plan as part of a complete permit application. Sections include:

- **Compliance with applicable post-construction performance standards in Wis. Admin. Code § NR 151.121 through § NR 151.128.**
- **Description of permanent storm water management practices at the site and technical rationale.**
- **Groundwater and bedrock information if using permanent infiltration devices.**
- **Separation distances of permanent storm water management practices from wells.**
- **Long-term maintenance agreement for site vegetation and any other permanent storm water management features.**

An ECSWMP will be completed to document compliance with Wis. Admin. Code § NR 216 and Wis. Admin. Code § NR 151. The ECSWMP will be provided with the Notice of Intent that is submitted to obtain the WPDES Construction Stormwater General Operating Permit from WDNR. Final stormwater BMP design/selection will be completed during final engineering.