

**Record of Categorical Exclusion**  
**for**  
**Wisconsin Power and Light Company's**  
**Edgewater Battery Energy Storage System Project**  
Loan Application #EIR0008

**Description of Categorically Excluded Action**

The United States Department of Energy (DOE) Title XVII Energy Infrastructure Reinvestment (EIR, 1706) Program was established pursuant to the Inflation Reduction Act of 2022, which amended Title XVII of the Energy Policy Act of 2005 to include the EIR Program. The EIR Program provides loan guarantees for projects that either: (1) retool, repower, repurpose, or replace energy infrastructure that has ceased operations; provided that if the project involves electricity generation through the use of fossil fuels, it is required to have controls or technologies to avoid, reduce, utilize, or sequester air pollutants and anthropogenic emissions of greenhouse gases; or (2) projects that enable operating energy infrastructure to avoid, reduce, utilize, or sequester air pollutants or anthropogenic emissions of greenhouse gases.

The DOE Loan Programs Office (LPO) is considering whether to issue a loan guarantee of a funding facility to the Wisconsin Power and Light Company (WPL) pursuant to its authority under the EIR 1706 Program. In its application, WPL has identified the Edgewater Battery Energy Storage System (BESS) project (Project), in the City of Sheboygan, Sheboygan County, Wisconsin, for inclusion in the funding facility that is the subject of DOE's loan guarantee. WPL may request inclusion of multiple individual projects with independent utility in the funding facility that is the subject of the DOE loan guarantee; accordingly, DOE will complete an environmental review pursuant to the National Environmental Policy Act (NEPA) for these projects prior to their inclusion in the funding facility that is the subject of DOE's loan guarantee.

The Edgewater BESS supports WPL's commitment to use a diverse portfolio of resources to provide safe, reliable, and affordable service to its customers. The site preparation (e.g., clearing, grading, and construction of foundations) and electrical and water line installation is complete or will be complete prior to LPO's Proposed Action. The Proposed Action considered in this record of categorical exclusion is LPO's issuance of Federal financial support for the battery purchase, installation, and interconnection portions of the Edgewater BESS Project.

**Project Description**

The proposed Project site, located at 3739 Lakeshore Dr., Sheboygan, WI 53081, is a 23-acre site located west of WPL's Edgewater Generating Station. WPL is the owner of the land on which the Project and the project collector substation, the Shoreline Substation, will be built. The land adjacent to the project includes industrial facilities to the north, vegetated fields to the south, and a forested buffer and residential areas to the west. The Edgewater Generating Station and the Sheboygan Wastewater Treatment Plant border the project to the east.

LPO's Proposed Action is limited to the purchase and installation of a 99-megawatt (MW) lithium-ion BESS and installation of additional systems required to safely interconnect to the grid. No ground disturbing activities will be conducted as part of the Project. The Project includes battery cabinets connected to pad-mount inverter/transformer skids, switchgear, collector substation additions, and an overhead power line that connects the Project to the electrical grid. The interconnection point is at the ATC Edgewater Switchyard and will utilize a combined interconnection point with the Edgewater Generating Station Unit 5 facility. The interconnection limit will be 99 MW. Interconnection upgrades will be required to tie into the 345kV bus configuration within the interconnection switchyard. The Edgewater BESS facility will be a standalone facility co-located, but separately metered, with the Edgewater Unit 5 generating facility interconnected at the existing ATC Edgewater switchyard 345 kV ring bus allowing the BESS facility to charge independently from the grid.

The Project will use existing surface roads for transportation of construction materials in accordance with applicable road use agreements. Two existing storm water detention basins within the Project boundary have been improved to reduce storm water runoff from the Project and meet the post-construction runoff management control requirements of Wisconsin Administrative Code Chapter NR 151. Each battery container includes fire detection and prevention systems to monitor and respond to battery fires, as well as battery management and exhaust ventilation systems to prevent fires from occurring. The BESS is anticipated to have a 20-year lifespan based on its expected use.

The battery installation is scheduled to begin in June/July 2026, with a projected commercial operation date of December 2026.

In accordance with the Endangered Species Act (ESA), LPO reviewed the Project, and the U.S. Fish and Wildlife Service concurred with LPO's conclusion that there would not be an adverse effect to ESA-listed species or designated critical habitat. The Project site is completely disturbed and contains no suitable habitat or sensitive biological resources, and there will be no disturbance from construction or operation activities on listed species or their designated critical habitat.

In accordance with the National Historic Preservation Act (NHPA), LPO consulted with the Wisconsin State Historic Preservation Office (SHPO). The Wisconsin SHPO concurred with LPO's finding of no historic properties affected for this project on May 21, 2025. DOE identified and contacted the following eleven (11) federally recognized Native American Indian Tribes (Tribes) that may have an interest in the Project area: Citizen Potawatomi Nation, Oklahoma; Forest County Potawatomi Community, Wisconsin; Fort Belknap Indian Community of the Fort Belknap Reservation of Montana; Hannahville Indian Community, Michigan; Lac Vieux Desert Band of Lake Superior Chippewa Indians of Michigan; Little Traverse Bay Bands of Odawa Indians, Michigan; Match-e-be-nash-she-wish Band of Pottawatomi Indians of Michigan; Menominee Indian Tribe of Wisconsin; Miami Tribe of Oklahoma; Ottawa Tribe of Oklahoma; and Prairie Band Potawatomi Nation. DOE did not receive any responses from Tribes regarding this Project.

The BESS infrastructure will not impact any jurisdictional wetlands, water features, or farmland and the project area is located outside of 100- and 500-year floodplains.

WPL coordinated review of additional regulatory requirements with Federal, State, and local officials and will obtain the following permit prior to initiating construction of the Project:

- Issuance of the Certificate of Authority (CA) by the Public Service Commission of Wisconsin (PSCW) (Docket No. 6680-CE-184)

The actions being considered under the Proposed Action are consistent with and covered by DOE categorical exclusions in 10 Code of Federal Regulations (CFR) Part 1021, Appendix B4, Categorical Exclusions Applicable to Electric Power and Transmission, respectively. This Project is covered by DOE Categorical Exclusions B4.11 and B4.14.

***B4.11 Electric power substations and interconnection facilities***

Construction or modification of electric power substations or interconnection facilities (including, but not limited to, switching stations and support facilities).

***B4.14 Construction and Operation of Electrochemical-Battery or Flywheel Energy Storage Systems***

Construction, operation, upgrade, or decommissioning of an electrochemical-battery or flywheel energy storage system within a previously disturbed or developed area or within a small (as discussed at [10 CFR 1021.410\(g\)\(2\)](#)) area contiguous to a previously disturbed or developed area. Covered actions would be in accordance with applicable requirements (such as land use and zoning requirements) in the proposed project area and the integral elements listed at the start of [appendix B of this part](#), and would incorporate appropriate safety standards (including the current National Fire Protection Association 855, Standard for the Installation of Stationary Energy Storage Systems), design and construction standards, control technologies, and best management practices.

**Regulatory Requirements Defined in 10 CFR § 1021.410(b)**

The Proposed Action was subjected to an environmental due diligence review by DOE LPO staff to ensure it is consistent with the specific category of actions (categorical exclusion) contained in Appendix B of 10 CFR Part 1021 and the conditions for applying categorical exclusions specified in Section 410 of Part 1021. To ensure the requirements of Appendix B were met, LPO staff reviewed project-related documents obtained between April 2024 and May 2025 and participated in conference calls with WPL staff to ensure a complete understanding of the activities associated with the project.

The environmental due diligence review determined that there is no controversy regarding the potential environmental impacts of the Proposed Action, and that the activities associated with the Federal financial support would not adversely affect any physical, biological, or socio-cultural resources associated with the deployment of the Project. The environmental due diligence review determined the Proposed Action has not been segmented to meet the definition of a categorical exclusion.

The Comment section below is provided for any necessary clarifications concerning the findings listed above. Signature by WPL's designated representative in the Corporate Validation section is an indication of WPL's concurrence with the findings and determinations presented above.

**Comment(s)**

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**Corporate Validation**

Name and Title (Print):

Raja Sundararajan, Executive Vice-President Strategy & Customer Solutions

Signature and Date:



June 9, 2025

**Determination**

Based on my review of information conveyed to me and in my possession concerning the actions associated with the proposed 1706 loan guarantee described above, as NEPA Compliance Officer (as prescribed in DOE Policy Directive 451.1), I have determined that the actions involve no extraordinary circumstances and fit within the specified category of actions in Appendix B of 10 CFR Part 1021 described above, and are hereby categorically excluded from further review under the National Environmental Policy Act (42 United States Code 4321, as amended).

**Signature and Date**

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Todd Stribley  
NEPA Compliance Officer  
Loan Programs Office