



Department of Energy
Washington, DC 20585

August 31, 2026

Tony L. Reese, Treasurer
Wisconsin Electric Power Company
213 W. Michigan St.
Milwaukee, WI 53203

Subject: U.S. Department of Energy, Office of Energy Dominance Financing Completion of Environmental Review for a Proposed Federal Loan Guarantee to Wisconsin Electric Power Company for the Paris Reciprocating Internal Combustion Engine Project in the Town of Paris, Kenosha County, Wisconsin

Dear Mr. Reese:

The United States Department of Energy (DOE), Office of Energy Dominance Financing (EDF), may provide Federal financial assistance (i.e., a loan or loan guarantee) under Title XVII of the Energy Policy Act of 2005, as amended (42 U.S.C. §§ 16511 et seq.).

As noted in EDF's July 28, 2026, letter, the DOE is considering whether to issue Federal financial assistance to Wisconsin Electric Power Company (WEPCO, or "the Applicant") pursuant to its authority. In its application for Federal financial assistance, WEPCO has identified the Paris Reciprocating Internal Combustion Engine Project (Paris RICE Project, or Project) located in the Town of Paris, Kenosha County, Wisconsin.

The Project components include the RICE generating facility, generator tie-in (gen-tie), driveway and access roads, and natural gas pipeline tie-in. The permanent generating facility would occupy approximately 10 acres and include the main engine hall, attached administration building, and radiator area. An additional approximately 31 acres would be temporarily disturbed for the primary laydown yard, trailers, and construction staging. The gen-tie line includes approximately 3,600 feet of overhead single-circuit interconnection line first south and then west from the RICE facility to the existing 138-kV Paris Solar Collector Substation.

The facility site requires a new driveway and access road for site access, designed to avoid local wetland impacts. The site is accessible via 1st Street (County Road KR). The driveway and access road total 3.21 acres, including approximately 0.8 acres for permanent site roads and approximately 2.41 acres of temporary workspace for construction. The proposed facility's natural gas tie-in will connect to the existing Lakeshore Lateral Project on-site gas conditioning equipment via a 1,500-foot-long 12-inch-diameter subsurface pipeline, which requires approximately 0.85 acres of trenching disturbance for installation.

WEPCO began construction of the Project in July 2025. The ground-disturbing site preparation and construction activities that occurred prior to September 2026, such as grading, filling, underground utilities, foundations, concrete slabs, and building installation, are not included in the application for Federal financial assistance.

EDF conducted the environmental reviews and consultations required by the applicable and relevant environmental statutes and Executive Orders (EOs) associated with its proposed Federal financial support. In addition, DOE relied upon the information and analysis contained in the completed Paris RICE Project Final Environmental Impact Statement, jointly prepared by the Public Service Commission of Wisconsin (PSCW) and Wisconsin Department of Natural Resources pursuant to the requirements of the Wisconsin Environmental Policy Act (December 2024, PSCW Docket 6630-CE-316). The applicable and relevant environmental statutes and EOs included:

1. Section 7 of the Endangered Species Act (16 U.S.C. § 1536)
2. Section 106 of the National Historic Preservation Act (54 U.S.C. § 306108)
 - a. EO 13175, Consultation and Coordination With Indian Tribal Governments
3. Farmland Protection Policy Act (7 U.S.C. §§ 4201–4209)

Summary of Applicable and Relevant Environmental Reviews

Section 7, Endangered Species Act

On July 23, 2026, EDF obtained an official species list (Project Code 2026-0120603) from the U.S. Fish and Wildlife Service (USFWS), which identified four species as occurring or potentially occurring in the Project area: the nonessential experimental population of the whooping crane, the proposed threatened monarch butterfly, the proposed threatened western regal fritillary, and the threatened eastern prairie fringed orchid. No designated critical habitat was identified in the Project area.

On July 23, 2026, EDF used the Minnesota-Wisconsin Federal Endangered Species Determination Key to reach “no effect” determinations for the whooping crane and eastern prairie fringed orchid. These determinations were based on site conditions. The Project footprint consists of historically cultivated agricultural land that lacks suitable habitat or documented occurrences of the eastern prairie fringed orchid and lacks the large wetland or marsh complexes suitable for breeding, nesting, or migratory stopover habitat for the whooping crane.

For the proposed threatened monarch butterfly and western regal fritillary, EDF determined that the Project is not likely to jeopardize the continued existence of either species. The Project area consists primarily of active agricultural fields and lacks the high-quality prairie, nectar sources, or host plants required to support significant populations of these species, and the Project is designed to avoid all surrounding wetland resources. Furthermore, a USFWS final listing decision for these proposed species remains a "long-term action" under the current [Unified Agenda of Regulatory and Deregulatory Actions](#), making formal conference consultation unnecessary at this time.

Section 106, National Historic Preservation Act and EO 13175

In accordance with the National Historic Preservation Act, EDF formally initiated consultation with the Wisconsin State Historic Preservation Office (SHPO) on July 28, 2026. On August 21, 2026, the Wisconsin SHPO concurred with EDF's finding that no eligible historic properties will be adversely affected by the Project.

On July 29, 2026, DOE identified and contacted ten federally recognized Native American Indian Tribes (Tribes) that may have an interest in the Project area and invited them to consult on historic properties of religious or cultural significance: the Citizen Potawatomi Nation, Oklahoma; Forest County Potawatomi Community, Wisconsin; Fort Belknap Indian Community of the Fort Belknap Reservation of Montana; 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. No comments were received from these Tribes.

Farmland Protection Policy Act

The Paris RICE Project is located almost entirely within soils designated as Prime Farmland or Prime Farmland if Drained. Per the requirements of the Farmland Protection Policy Act, EDF consulted the U.S. Department of Agriculture's Natural Resources Conservation Service Wisconsin State Office and completed the Farmland Conversion Rating Impact form (AD-1006 form) to assess potential impacts on farmland.

The completed form resulted in a total point score greater than 160, requiring EDF to consider alternative project sites, route alignments, or design modifications that could reduce or avoid the conversion of prime farmland. Where avoidance is not practicable, EDF must consider appropriate farmland-protection measures.

The Project's physical siting and ground-disturbing construction activities commenced in July 2025, pursuant to the PSCW approval granted in Docket 6630-CE-316, before Federal financial assistance was contemplated. Because EDF had no involvement in the initial siting decision and construction is underway, avoidance through selection of an alternative site is no longer practicable. The PSCW authorization incorporated several binding protection measures, such as topsoil segregation and separate stockpiling to prevent soil mixing; post-construction subsoil and topsoil de-compaction; the use of timber construction matting and low-ground-pressure tracked vehicles to prevent soil compaction and rutting; pre-construction coordination with landowners and the county drainage board to map and repair any damaged subsurface drainage tiles; implementation of an approved WDNR Stormwater and Erosion Control Plan; equipment cleaning protocols to prevent the spread of invasive species; and agricultural specialists and environmental monitors to oversee contractors and ensure compliance with these protection measures.

Conclusion

EDF notes that WEPCO is responsible for obtaining permits, approvals, and/or authorizations required for the construction and/or operation of the Project.

With this letter, EDF confirms that it has completed the environmental reviews and consultations required by the applicable and relevant environmental statutes and EOs associated with its proposed Federal financial support.

Respectfully,

Christina Gomer
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Office of Energy Dominance Financing

cc: Denis O'Meara, EDF Utilities Vertical Lead
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