We Energies
231 W. Michigan St.
Milwaukee, WI 53203
www.we-energies.com

July 12, 2019

Submitted Electronically

Ms. Lisa Creegan
Wisconsin Department of Natural Resources
2300 N Dr. Martin Luther King Drive
Milwaukee, WI 53212-3128

Mr. Matthew Claucherty
Wisconsin Department of Natural Resources
PO Box 7921
Madison, WI 53707-7921

SUBJECT: PARIS GENERATING STATION WPDES PERMIT NO. WI-0049131
PHOSPHORUS WATER QUALITY TRADING

Dear Ms. Creegan and Mr. Claucherty:

On March 28, 2019, Wisconsin Electric Power Company (doing business as We Energies) submitted an application for the reissuance of WPDES Permit No. WI-0049131-03-1 for Paris Generating Station (PSGS). An application for Phosphorus Water Quality Trading (WQT) was included in the submittal. On May 16, 2019, we received comments from the Department and suggested revisions. We appreciate the Department's willingness to participate in a conference call on June 27, 2019, to discuss the comments in greater detail.

Enclosed is a revised Phosphorus WQT Plan. Overall, the project approach remains the same. We Energies intends to install and maintain permanent vegetative cover (tallgrass prairie, mesic prairie, or wetland) on previously farmed fields within the same HUC-12 subwatershed as PSGS Outfall 001. The WQT Plan was revised to include results from updated modeling conducted to address the Department's comments and to account for the certified survey map prepared for the land division.

Pursuant to s. 283.84(1)(e), Wis. Stats., a binding, written agreement is required between We Energies and the Department to implement the WQT project. It is our understanding that both parties have come to mutual agreement on the language that should be included in the written agreement. Enclosed is the Water Quality Trade Agreement that has been executed by We Energies. The Department must execute the agreement for it to become effective.

We Energies intends to purchase the proposed parcel for the WQT project in Fall 2019 after completing property due diligence activities and receiving the reissued WPDES Permit incorporating WQT as the compliance alternative. The initial planting would occur in Fall 2019 after the property purchase is complete. This timing provides two growing seasons to ensure that the management practices are established (and credits are available) before the phosphorus limits become effective on October 1, 2021. In order to ensure that the water quality trading project is as successful as possible, **We Energies requests that the Department reissue the WPDES Permit on time by October 1, 2019**, to incorporate water quality trading as an alternative approach to total phosphorus WQBEL compliance.

If you have any questions about this submittal, please contact me at (414) 221-4337 or at alison.castronovo@wecenergygroup.com.

Sincerely,

Alison Castronovo, P.E.
Senior Engineer – Environmental

cc: Mr. Bryan Hartsook – WDNR, Milwaukee
Mr. Nick Lent – WDNR, Milwaukee
Mr. Andrew Craig – WDNR, Madison
Mr. Andrew Simek – WDNR, Madison

Enclosures