

Testimony on 2021 Assembly Bill 300

Senator Robert Cowles
Assembly Committee on Energy and Utilities
May 25th, 2021

Thank you, Chairman Kuglitsch and Committee Members, for holding a hearing and allowing me to testify on 2021 Assembly Bill 300. This bill establishes timelines for action by the PSC on water utility applications.

Under current law, before engaging in construction projects that aren't directly exempt or before implementing a lead service line (LSL) replacement program, water utilities must apply to the Public Service Commission of Wisconsin (PSC) for approval. In 2018, just short of 50 applications for a construction project, which is known as a certificate of authority, were filed by water utilities, and an additional three applications for LSL replacement programs were also filed that year.

This PSC approval process can not only be costly, but it can also be timely lasting months or even a full construction season. One of the longest delays in this process may not even take place while the request is being formally considered by the Commissioners after they've opened the Notice of Investigation (NOI), but rather it's the waiting time that's lapsed between submitting an application and having the NOI opened. Looking at the eight LSL applications that have been approved since 2017 Act 137 was signed into law, applicants have waited an average of 136 days between submitting an application and having the NOI opened. That compares to just an average of just 79 days between the opening of the NOI and a decision by the Commission.

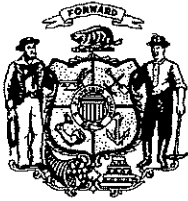
On average, the applicants were waiting 84 days from submitting their LSL application to even receive a data request for more information from the PSC. These requests were fulfilled in less than two weeks on average, only to wait an extra nearly 40 days on average before the NOI was opened. The worst delays are exemplified by Fond du Lac, which waited 152 days between submitting their application before receiving a data request from PSC, and Kaukauna, which fulfilled a data request then waited 211 days for the NOI to be opened.

This information on delays faced in the LSL replacement program can be translated to certificate of authority applications where there are many more examples of costly delays faced awaiting the NOI. These delays could be prevented, as numerous examples of timely review, data requests, and NOI openings also exist.

That's why 2021 Assembly Bill 300 looks to put a stop to these unnecessary delays by requiring that the PSC either request data or determine that an application is complete within 45 days of receiving an application for a certificate of authority or LSL replacement program. If a data request is filed by the PSC, all of the information missing must be stated, and then the PSC has another 30 days of review upon receipt of the data request response. The provisions created in this bill largely mimic statutes for the certificates of public convenience and necessity statutes which require similar PSC action within 30 days for major electric utility projects.

This bill was amended by Assembly Substitute Amendment 1 at the request of the PSC to remove a requirement that an NOI is opened within 14 days of an application being determined complete. It was pointed out that this may have at times presented issues as the NOI opening requires a meeting with a quorum of Commissioners, which may not always be able to be convened within 14 days. The intent of the bill is maintained in the amendment by requiring that final action is taken within 90 days or 180 days of an application being determined complete, depending on whether a hearing was held. This closely aligns with current law where an application must be determined complete within 90 days or 180 days of the NOI opening, depending on whether a hearing was held, but instead aligns this timeframe with the application being determined complete.

Assembly Bill 300 does not impact rate cases or any opportunities for public comments. Instead, this bill recognizes that the responsibilities placed upon local water utilities can make it a hard enough job without the delays faced in the water utility regulatory process. In short, AB 300 simply provides the certainty to water utility leaders that their applications will be given the attention they need and deserve so our local water utilities can continue doing what they're best at: providing their customers with clean, drinkable water out of the tap.



Public Service Commission of Wisconsin

Rebecca Cameron Valcq, Chairperson
Ellen Nowak, Commissioner
Tyler Huebner, Commissioner

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PSC Testimony on AB 300 -- Changes to the Approval Process for Lead Service Line Financial Assistance Programs
Assembly Committee on Energy and Utilities
May 25, 2021

Chairman Kuglitsch and committee members, my name is Matt Sweeney and I am the Public and External Affairs Director at the Public Service Commission (Commission). Today I am here to testify on behalf of Commission chairperson, Rebecca Cameron Valcq. Thank you for the opportunity to testify on AB 300, which makes changes to the Commission's approval of water utilities' financial assistance programs for replacing privately owned lead service lines.

As you may know, 2017 Wisconsin Act 137 established the process for Commission review of utility applications to provide financial assistance programs for replacing privately owned lead service lines (LSLs). I want to thank Senator Cowles and the utility committees for their leadership on this previous legislation, which provides utilities with an additional tool for addressing the difficult task of removing both the utility owned and customer owned side of service lines containing lead. Since enactment of Act 137, the Commission has authorized financial assistance programs for eight utilities. These programs will result in the removal of an estimated 14,250 customer owned LSLs. Commission staff has worked with a number of these communities to help them optimize use of both DNR and utility customer funding.

Under the current LSL review processes, Commission staff send a data request to a utility when its application is incomplete stating that staff is reviewing the utility's application and needs additional information to process the application. The requirement in this bill for the Commission to make a determination that an application is incomplete would work well with our existing processes and would help provide more regular feedback to utility staff. By setting clear expectations and standards, these revisions could help improve applications the Commission receives.

I would also like to comment on the bill requirement that the Commission issue a notice to open a docket for a Certificate of Authority or LSL application within 90 days of the Commission staff completeness determination for cases without a hearing, and within 180 days of the Commission staff completeness determination for those cases with a hearing. Given the need for approval from the Commission of notices, and the legal and practical scheduling requirements necessary for complying with the open meetings law, prior statutory time limitations have not set a specific number of days upon which the Commission must issue a notice opening a docket in these cases. Instead of establishing a timeframe at the beginning of a case for a notice to be issued, the statutes typically establish a date by which final action by the Commission must be taken.

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We are appreciative that the bill authors incorporated into the substitute amendment an approach that is consistent with other statutory requirements and does not present conflicts with scheduling or open meeting requirements.

I want to thank Representative Thiesfeldt and Senator Cowles for working with us to address our technical concerns through the substitute amendment. As amended, Chairperson Valcq is eagerly inclined to support the bill. The PSC welcomes the opportunity to enhance the transparency and efficiency of our construction and LSL financial assistance review processes. Having a common understanding of where an application stands benefits everyone – utility staff, Commission staff, and most importantly, utility customers.

On behalf of Chairperson Valcq, I thank the committee for consideration of AB 300 and urge your support and adoption of the substitute amendment.

Thank you.



To: Members, Assembly Committee on Energy and Utilities
From: League of Wisconsin Municipalities
Municipal Environmental Group – Water Division
Wisconsin Rural Water Association
Date: May 25, 2021
Re: Support for AB 300 to Establish a Process and Timeline for PSC to Determine a Water Utility’s Application for Approval of a Construction Project or Lead Service Line Financial Assistance Program is Complete

Our organizations submit these comments in support of Assembly Bill 300 (as amended by Assembly Substitute Amendment 1). AB 300 would establish a process and timeline for the PSC to determine whether a water utility’s application for approval of a construction project or a lead service line financial assistance program is complete and ready for PSC consideration. This bill would provide applicants with 1) clear direction on what additional information is needed for the PSC to determine an application is complete, and 2) more certainty regarding when a decision on an application will be issued.

Public utilities are required to obtain a certificate of authority from the PSC before engaging in certain construction projects. Water public utilities must also obtain PSC approval to provide financial assistance to a property owner seeking to replace customer-side lead service lines. Current law requires the PSC to take final action on either type of application within 90 days after the PSC issues a notice opening a docket on the application or, if a hearing is held on the application, within 180 days after the PSC issues a notice of hearing. Current law, however, does not establish when a notice opening a docket, or a notice of hearing must be issued.

While PSC practice is to issue a notice after the PSC determines an application to be “complete,” the PSC has substantial discretion in determining when an application is complete. As part of the application process, the PSC is authorized to require that an applicant submit “any other information relevant to the project requested by the commission.” As a result, an applicant may not know ahead of time what additional information will be requested before the PSC will consider an application to be “complete.”

This bill would require the PSC to review an application within 45 days after filing and notify the applicant of all the additional information required, if any, to make the application complete. An applicant would then be entitled to submit the additional information and after a re-filing, the PSC would have 30 days to review for completeness. The PSC must take final action on a application within 180 days after the application is determined to be complete if a hearing is held, or 90 days after completeness determination if a hearing is not held. Note: This provision was changed in the substitute amendment.

This additional detail will provide water utilities more certainty regarding the PSC process, expectations, and the timeframe that it will take to obtain the necessary regulatory approval. As a result, water utilities will be better able to cost-effectively coordinate planning, financing, and construction of utility infrastructure projects and private lead service line replacement. On behalf of our organizations, we ask for your support for this legislation.



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To: Assembly Committee on Energy and Utilities
From: Toni Herkert, Government Affairs Director, League of Wisconsin Municipalities
Date: May 25, 2021
RE: AB 300, relating to timing of PSC approvals and AB 302, relating to meter installment

Chairman Kuglitsch and members of the Energy and Utilities Committee,

My name is Toni Herkert, and I am the new Government Affairs Director for the League of Wisconsin Municipalities. Thank you for hearing these two bills important to water utilities today. I appreciate the opportunity to testify before you in support of AB 300 and AB 302. The League worked on these bills as a member of a water utility coalition with MEG Drinking Water Division and Wisconsin Rural Water Association. The League would also like to thank the authors Senator Cowles, Representative Thiesfeldt, and Representative VanderMeer for their hard work and commitment to finding a compromise on these important bills.

As you are probably aware, Wisconsin has 11,525 public water systems, the largest number of any state. Public water systems are defined as those that provide water for human consumption to at least 15 service connections or regularly serve at least 25 people for 60 days or longer per year. Municipal systems are included in a category called community water systems which serve water to people where they live or work. Wisconsin's community water systems serve 70 percent of the state's population. The other 30 percent of the state's residents get their water from private wells.

Municipal community water systems are owned by cities, villages, towns, or sanitary districts and include care and correctional facilities that are owned by counties or municipalities. Wisconsin has 611 municipal systems. Milwaukee Waterworks is the state's largest, serving almost 600,000 people. Wisconsin's smallest municipal water systems, by contrast, serve fewer than 50 people each. While municipal systems only account for 611 of the over 11,000 public water systems, they service over 4 million of the state's residents.

The primary objective for municipal water systems is to provide safe, timely, and reliable distribution of water and other related services to the public for domestic, commercial, or industrial purposes. Water utilities keep a keen eye on efficiencies and technical and financial feasibility to provide the most reliable and efficient service to rate payers in the most economical manner. AB 300 and AB 302 aid in this overall mission by removing some of the red tape and administrative inefficiency from the process of construction authorizations and meter installation or replacement. By providing clear timelines for projects and eliminating delays in the approval process, utilities can better plan, utilize and align financing, and provide related benefits to their customers. With the recent American Rescue Plan Act sending federal funding to municipalities, we have been told that water and sewer projects are on many municipal short lists. Providing the efficiencies, timelines, clarity, and consistency will help move these projects through completion before the federal funding deadlines.

Thank you for your time and I would be happy to answer any questions you may have.

YOUR VOICE. YOUR WISCONSIN.



May 25, 2021

Members of the Assembly Committee on Energy and Utilities

Re: **Support for 2021 Assembly Bills 300 and 302**

Dear Members of the Assembly Committee on Energy and Utilities,

Please accept this letter as an indication of support for **Assembly Bill 300 (AB 300)** and **Assembly Bill 302 (AB 302)**. As a representative of a local unit of government and a water utility providing service to approximately 67,000 residents, these bills have the potential to save us, and other local governments like us, thousands of dollars and weeks, if not months, of time.

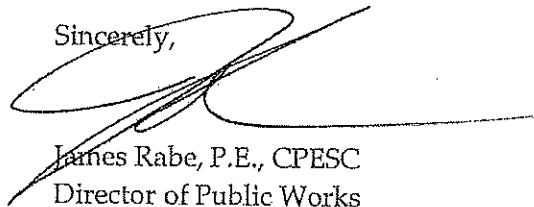
AB 300 would ensure that applications submitted by public water utilities have statutory deadlines for actions by the Public Service Commission of Wisconsin (PSC). Currently, the PSC has deadlines related to actions once a Notice of Investigation (NOI) is opened and until a final decision is granted. Unfortunately, there are no such timelines from the time the application is submitted up to the time the NOI is opened, which creates uncertainty, and often very lengthy delays. Providing specificity in the timeframes both before and after the NOI would help provide local governments more financial and project planning certainty.

AB 302, as amended, would exempt water meter installation, repair, or replacement projects from the Construction Authorization (CA) process. Current PSC rules do not require CA review and approval for electric utilities to replace and upgrade meters; rather, they appear to presume that the meter upgrades are in the public's best interest. However, water utilities have to spend hundreds, if not thousands, of dollars and wait months for the PSC to perform a CA review on a common and necessary project to replace meters or roll the dice with the confusing regulations surrounding current law exemptions. This change would not only save water utilities, and therefore our customers' time and money, but would align water utility regulations with those of other utilities.

I ask for your support of these proposals that will help water utilities throughout the state by creating more clarity, certainty, and consistency among the regulation of utilities in Wisconsin.

Thank you for your time and consideration of this letter.

Sincerely,



James Rabe, P.E., CPESC
Director of Public Works

JER/ttt



Waukesha Water Utility

SERVING WAUKESHA SINCE 1886

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WAUKESHA, WI 53188-3615

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May 24, 2021

Chairman Mike Kuglitsch
State of Wisconsin Assembly Committee on Energy and Utilities
Room 129 West
State Capitol
PO Box 8952
Madison, WI 53708

RE: Assembly Bill 300

Honorable Chair and Committee Members:

Assembly Bill 300 is an Act to renumber 196.49 (5r) (a); and to create 196.372 (3) (am) and 196.49 (5r) (ad) of the statutes; Relating to: deadlines for certain Public Service Commission actions after a water public utility application for certificate of authority or approval of lead service line financial assistance is filed.

The City of Waukesha Water Utility fully supports AB300. For any Utility that is in the process of completing a Capital Improvement project that requires Public Service Commission (PSC) approval, it is important for the review of the project to be completed in a timely fashion. That requires prompt responses from both the PSC as well as the party requesting the approval. This is especially important when the project plans to utilize funding sources that have deadlines that need to be met. Having some certainty in the scheduling for certificate of authority from the PSC would be very beneficial to Utility's across the state.

Delays also increase the cost of the project due to construction cost inflation which tends to outpace the consumer price index.

Thank you for your time and attention to this very important matter. Please contact me at (262) 409-4440 if you have any questions or would like any further information.

Sincerely,

Daniel S. Duchniak, P.E.
General Manager



Green Bay Water Utility

General Manager Nancy Quirk, P.E.

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May 25, 2021

2021 Assembly Committee on Energy and Utilities

Representative Mike Kuglitsch (Chair)

Representative Steffen (Vice-Chair)

Representative Tranel

Representative Oldenburg

Representative Petryk

Representative Neylon

Representative Vorpagel

Representative Tauchen

Representative Petersen

Representative Horlacher

Representative B. Meyers

Representative Subeck

Representative Andraca

Representative Moore Omokunde

Representative S. Rodriguez

Wisconsin State Capitol

Madison, WI 53708

RE: Assembly Bills 300—Public Service Commission Deadlines, and 302—Meter Installation

Honorable Chairman Kuglitsch and Distinguished Committee Members:

Thank you for your dedication to Wisconsin's safe drinking water. I have proudly served Wisconsin water utilities as a professional engineer and leader for more than 33 years—and was recently appointed to the EPA's National Drinking Water Advisory Council. As General Manager for Green Bay Water Utility, I appreciate the challenge before you to make the rules that guide a critical workforce during difficult circumstances.

Our utility proudly received recognition on national news headlines for being the first Wisconsin water utility to voluntarily remove all lead services, which we accomplished from 2016 to 2020. The challenges we faced largely came down to funding: relying on the Safe Drinking Water Act Principal Loan Forgiveness Program, a City of Green Bay excess sales tax from Lambeau Field, and most notably (for the sake of this letter) the *Leading on Lead Act* (Senate Bill 48) signed in 2018.

Our utility and customers deeply appreciated this much-needed solution to replacing all private lead services without the total funding to do so. However, as you'll see by the timeline below, we were pinched by the painstaking eight-month PSC approval process. Green Bay Water Utility expected the process to be complete within 90 days and even initiated a pre-application conference call with PSC and DNR, ensuring we had all expectations established to fulfill every aspect of their application. When you look at the timeline below, ask yourself: why would this have taken eight months to get the PSC's approval when public health was at stake? By the way, our records show we paid the PSC \$6,758.76 in 2020 for their review of our application for lead funding for our utility customers.

TIMELINE

- November 14, 2019: Green Bay Water Utility officially files PSC application
- January 9, 2020: 57 days passes with no word from PSC; GBWU notes five pending cases, with one utility still pending after 261 days
- February 11, 2020: Concern growing, still-pending GBWU sent a letter of urgency to PSC with construction season just three months away
- April 21, 2020: application still pending. Five words are changed to update to a related city ordinance which should have had no impact on GBWU's PSC application; however, the change prompts PSC staff to tell the PSC commission they need an extension
- On May 7, 2020: the PSC commission grants PSC staff an extension with the GBWU application
- May 13, 2020: Sen. Cowles is made aware of this delay, realizing the start of construction season, and sends a letter of urgency to PSC about the GBWU application
- May 21, 2020: PSC commission approves GBWU application
- June 11, 2020: PSC issues final approval of GBWU application
- July 20, 2020: PSC approves tariffs with construction season more than halfway over. **We were not able to begin work until this day.**

Committee, utilities are called to be servants of public health. Habitual delays by the PSC plague Wisconsin's drinking water industry as a whole, not just GBWU—but when lead service replacements are at stake, this type of delay is all the more unacceptable. Please support Assembly Bill 300 for the sake of utilities trying to do right by their customers by replacing toxic lead pipes on a reasonable timeline.

I also urge you to support Assembly Bill 302, removing the need for utilities to obtain PSC permission to upgrade meters. From 2005 to 2013, Green Bay Water Utility transformed from a meter-reading employee walking door-to-door—to our smart water meters made right here in Wisconsin by Badger Meter. These meters instantly upgraded our customer's experience and made us more efficient, saving us time and money, and using technology to quickly alert us to concerning changes in water usage. This upgrade came with an upfront cost. Technology can be that way—as we all know, having gone from offices that used to supply a desk phone, but now must supply a desktop computer. Didn't that change make us more efficient?

Customer water meters are standard pieces of equipment that every water utility has in common. We utility leaders of Wisconsin consult one another to discuss modern technology and worthwhile investments on a regular basis. After all, we are the ones working in utilities day after day—and the ones who know our customers and local circumstances the best. It is baffling that we could trust our utility experts to deliver safe drinking water to millions of people each day, but cannot trust these same utility managers, engineers and our metering staff to decide when the time is right to make necessary changes to technology, for the benefit of everyone.

Not only do we have to consult, apply and wait for the PSC to make the decision, but the process is frequently delayed by the commission, greatly impacting project timelines. Delays impact everything. And let me tell you: we are facing a workforce shortage. Green Bay Water Utility is not at full staff, and neither are most other utilities in the state, according to fellow managers I confide in regularly. I want to reiterate that we utilities have to pay the PSC out of our general budgets for the all the time they put into these decisions. PSC staff may not even have the background needed or full scope of understanding of these projects. Our utilities use valuable staff time to work on this approval process after we have already decided as a utility. So ask yourself: should ratepayer money and staff time be used on a PSC application to upgrade meters to smarter technology? My answer is no. Meters are one thing utilities easily handle on our own without the PSC's help, and in turn, removing it from their duties will assist them with their backlog of cases.

Thank you for your consideration in support for AB300 and AB302.

Sincerely,

A handwritten signature in cursive script that reads "Nancy Quirk".

Nancy Quirk, P.E.
General Manager
Green Bay Water Utility



CITY OF LA CROSSE UTILITIES
WATER - SEWER - STORM

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05/19/2021

Bernard N Lenz, P.E.
Utilities Manager
lenzb@cityoflacrosse.org

Tina Erickson
Utilities Accounting &
Customer Support Supervisor
ericksont@cityoflacrosse.org

Dear Assembly Committee on Energy and Utilities,

The City of La Crosse Water Utility supports AB-300 related to establishing a PSC deadlines for "completeness determinations" and supports AB-302 to eliminate, for all water meter installation or replacement projects, the requirement of obtaining a PSC construction approval.

Both bills will allow the Utility to operate more efficiently and better serve our customers, ultimately meaning lower rates and happier customers.

Thank You for your considerations.

A handwritten signature in black ink that reads "Bernard N. Lenz". The signature is written in a cursive style with a long, sweeping underline.

Bernard N. Lenz, PE – City of La Crosse Utility Manager

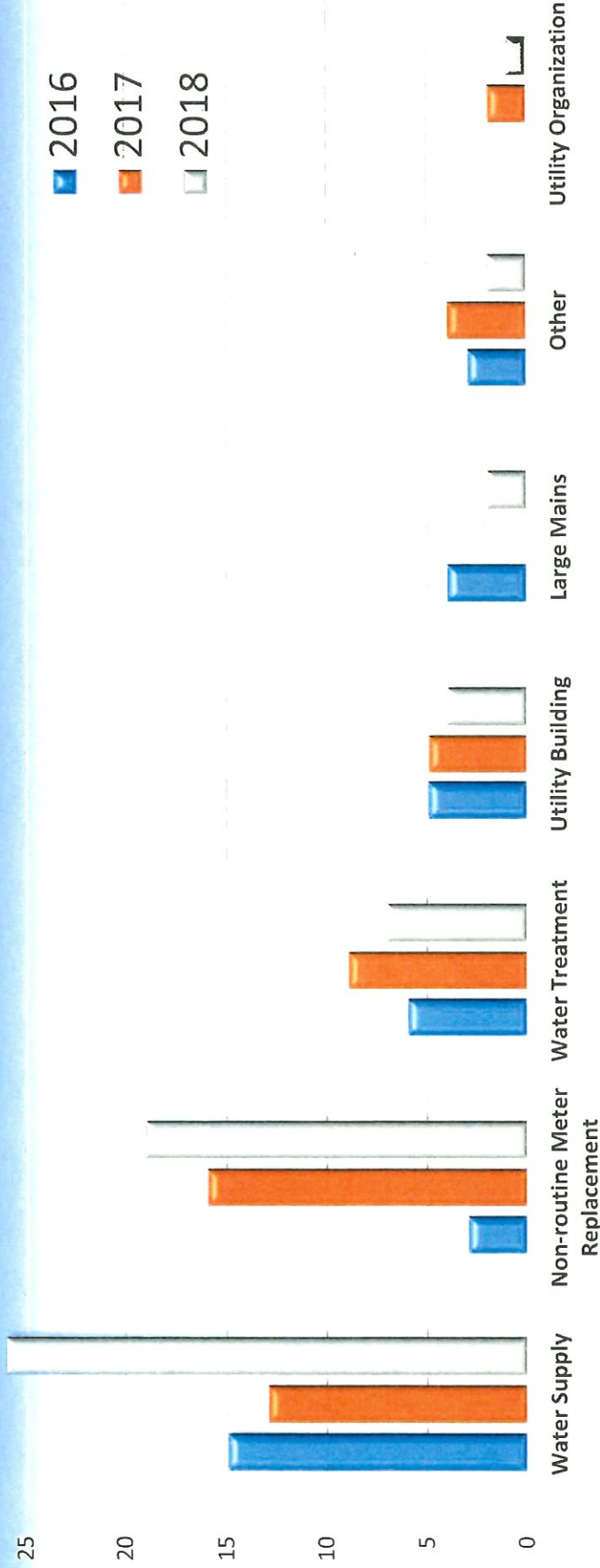
**Private Lead Lateral Replacement Financial Assistance Program
Application Dates and Action Periods**

Applicant Docket No.	Application Date	Data Requests	Answers Provided	Notice of Investigation Days since application	PSC Approval Total days since application
Kenosha 2800-LS-100	4/3/2018	1	5/3/2018	5/18/2018	6/7/2018
		2	6/27/2018	6/28/2018	65 days
Manitowoc 3320-LS-100	9/11/2018	1	11/8/2018	11/26/2018	12/20/2018
		2	2/27/2019	2/28/2019	100 days
		3	Unknown	3/1/2019	
Menasha 3560-LS-100	10/22/2018	1	12/21/2018	1/4/2019	2/21/2019
				122 days	6/6/2019
				227 days	
Kaukauna 2800-LS-100	4/24/2019	1	7/3/2019	7/17/2019	2/13/2020
				295 days	6/25/2020
				428 days	
Fond du Lac 2010-LS-100	8/16/2019	1	1/15/2020	1/24/2020	2/13/2020
				181 days	5/12/2020
				270 days	
Sun Prairie 5810-LS-100	10/8/2019	1	2/6/2020	2/21/2020	2/13/2020
				128 days	5/12/2020
				217 days	
Sheboygan 5370-LS-100	10/30/2019	1	1/27/2020	2/7/2020	2/13/2020
				106 days	7/23/2020
				267 days	
Green Bay 2350-LS-100	11/14/2019	1	2/12/2020	2/21/2020	2/13/2020
		2	4/15/2020	4/16/2020	91 days
					6/11/2020
					210 days

Prepared May 19, 2021, with information compiled from the PSC ERF site:
<https://apps.psc.wi.gov/ERF/ERF/ERFhome.aspx>

Construction Authorizations by Project Type

30



Time Tracker for LSL Applications

Updated March 17th, 2021

Applications Approved (8):

- Kenosha (2820-LS-100) applied April 3, 2018, and approved August 16, 2018.
- Manitowoc (3320-LS-100) applied September 11, 2018, and approved March 7, 2019.
- Menasha (3560-LS-100) applied October 22, 2018, and approved May 15, 2019.
- Fond du Lac (2010-LS-100) applied August 16, 2019, and approved March 19, 2020.
- Sun Prairie (5810-LS-100) applied October 8, 2019, and approved March 19, 2020.
- Green Bay (2350-LS-100) applied November 14, 2019, and approved May 21, 2020.
- Kaukauna (2800-LS-100) applied April 24, 2019, and approved May 28, 2020.
- Sheboygan (5370-LS-100) applied October 30, 2019, and approved June 18, 2020.

Approval Times (Application to Commissioner Approval):

- | | |
|-------------------------|-------------------------|
| • Kenosha: 135 Days | • Manitowoc: 177 Days |
| • Menasha: 205 Days | • Fond du Lac: 216 Days |
| • Sun Prairie: 163 Days | • Green Bay: 189 Days |
| • Kaukauna: 400 Days | • Sheboygan: 232 Days |

AVERAGE: 214.6 Days

Legal Requirements:

- s. 196.372 (3) (b), Wis. Stats.
 - “Upon receipt of a complete application, the commission shall investigate the application. The investigation may be with or without public hearing. If the commission conducts a public hearing, the public hearing shall be upon such notice as the commission may require.”
- s. 196.372 (3) (c), Wis. Stats.
 - “If a hearing is held on an application, the commission shall take final action on the application within 180 days after the commission issues a notice of hearing on the application. The chairperson of the commission may extend the time period for an additional 180 days for good cause. If the commission fails to take final action within the initial 180-day period, or the extended 180-day time period, the commission is considered to have granted its approval.”
- s. 196.372 (3) (d), Wis. Stats.
 - “If a hearing is not held on an application, the commission shall take final action on the application within 90 days after the commission issues a notice opening a docket on the application. The chairperson of the commission may extend the time period for an additional 90 days for good cause. If the commission fails to take final action within the initial 90-day period, or the extended 90-day time period, the commission is considered to have granted its approval.”

Timelines of Pre-NOI Questions and Responses

Utility Name	Application Date	Data Request from PSC	Utility Response	Notice of Investigation (NOI) Date	Days from Application to Data Request	Days from Response to NOI
Kenosha	04/03/18	05/03/18	05/18/18	06/07/18	30 Days	20 Days
Manitowoc	09/11/18	11/08/18	11/26/18	12/20/18	58 Days	24 Days
Menasha	10/22/18	12/21/18	01/04/19	02/21/19	60 Days	48 Days
Kaukauna	04/24/19	07/03/19	07/17/19	02/13/20	70 Days	211 Days
Fond du Lac	08/16/19	01/15/20	01/24/20	02/13/20	152 Days	20 Days
Sun Prairie	10/08/19	02/06/20	02/19/20	02/13/20	121 Days	- 6 Days
Sheboygan	10/30/19	01/27/20	02/07/20	02/13/20	89 Days	6 Days
Green Bay	11/14/19	02/12/20	02/21/20	02/13/20	90 Days	- 8 Days
<i>Average</i>					<i>83.8 Days</i>	<i>39.4 Days</i>

* Longer than 45 Days → 9 of 16 Periods (56.3%)

Timeline of LSL Applications

Utility Name	Application Date	Notice of Investigation (NOI) Date	Approval by Commission	Notice of Final Decision	Days from Application to NOI	Days from NOI to Commission Approval	Days from Application to Final Approval
Kenosha	04/03/18	06/07/18	08/16/18	08/31/18	65 Days	70 Days	150 Days
Manitowoc	09/11/18	12/20/18	03/07/19	03/19/19	100 Days	77 Days	189 Days
Menasha	10/22/18	02/21/19	05/15/19	06/06/19	123 Days	83 Days	229 Days
Kaukauna	04/24/19	02/13/20	05/28/20	06/25/20	295 Days	105 Days	428 Days
Fond du Lac	08/16/19	02/13/20	03/19/20	05/12/20	181 Days	35 Days	270 Days
Sun Prairie	10/08/19	02/13/20	03/19/20	05/12/20	128 Days	35 Days	217 Days
Sheboygan	10/30/19	02/13/20	06/18/20	07/23/20	106 Days	126 Days	267 Days
Green Bay	11/14/19	02/13/20	05/21/20	06/11/20	91 Days	98 Days	210 Days
<i>Average</i>					<i>136.1 Days</i>	<i>78.6 Days</i>	<i>245.0 Days</i>