



Public Service Commission of Wisconsin

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Public Service Commission of Wisconsin
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October 29, 2025

Michelle Stahl, Clerk/Treasurer
 Campbell Water Utility
 2219 Bainbridge Street
 La Crosse, WI 54603-1356

Re: Application of the Town of Campbell, as a Water Public
 Utility, for Authority to Construct a New Water System, in
 the Town of Campbell, La Crosse County, Wisconsin

935-CW-102

Dear Michelle Stahl:

On October 2, 2025, Campbell Water Utility (applicant) filed an application with the Public Service Commission of Wisconsin (Commission) for authority to construct a new water system, in the Town of Campbell, La Crosse County, Wisconsin. ([PSC REF#: 562393](#), [PSC REF#: 564463](#).) The application was filed pursuant to Wis. Stat. § 196.49 and Wis. Admin. Code § PSC 184.03, which require the Commission to determine whether a Certificate of Authority should be granted.

Commission staff reviewed the application to construct the facilities described above. Based on this review, the Commission has determined that the application is incomplete and, by this letter, notifies the applicant of this determination as required by Wis. Stat. § 196.49(5r)(c)1.

In Attachment A, Commission staff identifies the parts of the application determined to be incomplete and states the reasons for the determination. Wisconsin Stat. § 196.49(5r)(c)1. provides that an applicant may supplement and refile an application that the Commission deems incomplete. Until the applicant does so, Commission staff will place the application on hold and will not conduct further review.

If the applicant chooses to refile its application, please file a revised application or supplemental materials directly to the Commission's [Electronic Records Filing](#) (ERF) system under the docket number 935-CW-102 and using the document type "Application." Upon the applicant's refile, Commission staff will determine the application's completeness within 30 days pursuant to Wis. Stat. § 196.49(5r)(c)1. Please note that subsequent staff review may identify additional information or areas requiring clarification, and the Commission may determine that the application is still incomplete.

In order to receive notification of official correspondence (i.e. data requests, notices, final decisions, etc.), individuals must subscribe to the Utility ID or this PSC Docket. To subscribe, go to the Commission's [ERF](#) system. For help subscribing, go to [Subscribing to Dockets](#).

If you have any questions, please contact Gus Uribe at (608) 266-5726 or Gustavo.Uribe@wisconsin.gov.

Sincerely,

A handwritten signature in black ink, appearing to read "A.P. Galvin", followed by a horizontal line extending to the right.

Andrew P. Galvin
Administrator
Division of Water Utility Regulation and Analysis

APG:GAU:rgs DL:02098822

Attachment A: Reasons for the Determination and Supplemental Questions

Attachment A

Reasons for the Determination

1.1 (IV. General Project Description)

- a. The application fails to describe the project accurately. Well No. 1 has already been authorized and should not be included in the project description. A complete application would provide an updated project description that does not include Well No. 1.

1.2 (V. Project Costs)

- a. The application fails to provide an accurate total project cost. A complete application would consider the following:
 - i. Well No. 1 has already been authorized and should not be included in the total project cost. A complete application would provide an updated project cost that does not include Well No. 1.
 - ii. Ensure that costs throughout the application are consistent with the total project cost. If not, provide an explanation of why. For example: Provide answers to the questions below:
 - a. The project cost on page 42 of the application does not match the total project cost. Please revise or provide an explanation of the cost differences.
 - b. The cost estimates on Attachment 8 PART B ([PSC REF#: 562549](#)) from pages 69 to 93, and the interest and operation & maintenance (O&M) cost from page 42 of the application, do not match the total cost project cost. Please revise or provide an explanation of the cost differences. Please do not include the cost of Well No. 1 in the new calculation.
 - iii. The total cost includes O&M cost for the first year. This item is not a construction cost and should not be included in the total project cost. Correct the cost accordingly.
 - iv. The \$374,000 sewer main cost should not be included because this is not a water asset, and it is not regulated nor recoverable by water rates. Correct the cost accordingly.
 - v. The Town of Campbell's (Town) share of the street construction costs should not be included in the total cost because it is not considered a water utility asset, and it is not regulated nor recoverable by water rates. Correct the cost accordingly.
- b. The application fails to allocate items correctly in the corresponding [PSC Uniform System of Accounts](#). Correct the allocations according to the bullets below:

- i. The applicant should allocate the raw water main from the wells in Account 316 (Supply Mains.)
- ii. The street costs are included in Account 341 (Structures and Improvements). This is not correct. The applicant should allocate its share of these costs to Accounts 343 (Distribution Main and Valves) and 348 (hydrants, laterals, and services).

1.3 (VII. Project Rate Impact)

- a. The application fails to provide an estimated water rate. At the August 25, 2025 meeting, Commission staff informed the applicant that it needed to provide estimated customer rates based on Commission rate-setting methodology with the construction application. Provide the water rate estimate accordingly.

1.4 (VIII. Project Funding Sources)

- a. The application fails to provide detailed information about the funding sources. Respond to the questions below:
 - i. The applicant listed connection charges of \$500 per Residential equivalent unit, for a total of \$840,500, as a funding source. During multiple meetings, Commission staff have explained to the applicant that the Commission has not allowed connection charges. Please provide an explanation regarding how the applicant would assess a connection charge. Explain how the applicant plans to cover this \$840,500 of project costs if it does not change connection charges.
 - ii. The applicant listed a \$8,540,000 United States Department of Agriculture Rural Development grant, two Environmental Protection Agency grants for a total of \$3,666,000, and \$5,100,000 in Safe Drinking Water Loan Program and Principal Forgiveness funds. Provide documentation to show that the applicant has been awarded all four of these grants.
 - iii. The applicant listed four loans. For each of the loans, provide when the applicant plans to close on the loan.
 - iv. For each of the loans listed, provide an estimated repayment schedule.

1.5 (IX. Environmental Impact Component of the Application)

- a. The application fails to include confirmation that the applicant has evaluated the impact of proposed construction, in particular the above ground storage tank, for impact to all Wisconsin Historic Preservation Database (WHPD) Architecture Historic Inventory (AHI) properties in the indirect (visual) area of potential effect (APE). If adverse visual effects would occur, identify and provide a description of all WHPD AHI properties with those facilities' indirect (visual) APE. For WHPD AHI

- properties within the indirect APE, determine the boundaries, historic significance, and integrity of each resource as they apply to Wis. Stat. s. 44.36(2).
- b. The application fails to 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.
 - c. The application fails to provide the methods the applicant will use for avoiding, minimizing, and mitigating construction impacts in and near waterways. This discussion should include, but not be limited to, how the applicant avoided waterways for the project scope and plans, installation methods (i.e., directional bore versus open-cut trenching or plowing), equipment crossing methods, sediment and erosion controls, invasive species protocols for equipment, etc.
 - d. The application fails to provide the location and size of any temporary staging and equipment storage for waterways that will be directionally bored.
 - e. The application fails provide a contingency plan for bore refusal and containment and clean-up of any inadvertent releases of drilling fluid (i.e., a frac-out) for waterways that will be directionally bored.
 - f. The application fails to verify if the applicant will follow and adhere to Wisconsin Department of Natural Resources (DNR) [Technical Standard 1072](#).
 - g. The application fails to provide details on how the project will cross and install assets across the various waterway crossings within the project area (i.e., Clinton St., Nakomis Ave., Kiowa Pl., Tellin Ct., etc.).
 - h. The application fails to make clear or provide details on whether the project scope will include any outfalls and/or riprap placed at or below the ordinary high-water mark of any waterways.
 - i. The application fails to verify whether the project scope includes any public or private road work.
 - j. The application fails to 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.).
 - k. 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).
 - i. Note - program practice requires field verification for all areas of permanent fill.
 - l. The application fails to describe 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 the applicant avoided wetland impact for the project scope and plans, installation methods, sediment and erosion controls, invasive species protocols for equipment, etc.
 - m. The application fails to provide a single map set with the following displayed for each proposed and alternative site/route (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 page numbers to reference the overview page, and have consistent scales throughout the pages.

- i. Most recent leaf off aerial image.
- ii. Wisconsin Wetland Inventory (“Mapped Wetlands” Surface Water Data Reviewer (SWDV) layer) and hydric soils (“Wetland Indicators & Soils” SWDV layer).
- iii. Wisconsin Surface Waters (“Surface Waters” SWDV layer).
- iv. Vehicle crossing method of waterways for both permanent and temporary access, labeled by the crossing method (i.e., use of existing bridge/culvert).
- v. Register of Waterbodies (ROW).
- vi. Locations of temporary and permanent structures.
- vii. Segment names and nodes.
- viii. Access paths (both on and off-ROW). Off-ROW access roads should be labeled with an identifying name or number.
- ix. Staging areas, laydowns, and any temporary workspaces, such as directional bore setup pads.
- x. Footprint of new facilities and/or footprint of existing facilities to be expanded, and associated driveways and permanent storm water management features to be built (ponds, swales, etc.).
- xi. Underground pipeline 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.).
- xii. Limits of disturbance (be sure to indicate if it varies across project activities – i.e., if certain sections will be located exclusively within impervious areas).
- n. The application fails to provide any documentation or correspondence from the DNR Remediation and Redevelopment (R&R) and/or Solid Waste Programs regarding the contaminated sites within the project areas.
- o. The application fails to provide additional details on the coordination or plan to coordinate with the DNR R&R and/or Solid Waste Programs regarding the contaminated sites within the project area.
- p. In regard to AFR section 3.9.2, specify depth and width of trenching required for watermain construction. If width and depth vary for various diameter watermains, provide the respective specifications for trenches to be dug for each diameter pipe.

Supplemental Questions

1. Provide the total final cost of Well No. 1.
2. What is the current state of the La Crosse service agreement? Provide a copy of the terms of the agreement.

3. Attachment 7 for the water demand analysis is mentioned in Section E of the application “Supplemental Questions-Water Treatment Facilities.” This attachment is missing. Clarify if this is a typographical error or provide the attachment accordingly.
4. Clarify whether the sewer department will pay for the \$374,000 cost of sewer mains. If not, will the applicant contribute \$374,000 to the sewer department to cover this cost? Please explain how the parties determined the cost responsibility.
5. If the \$14,849,272 in Account 341, Part V, is street reconstruction and the \$7,260,000 in Part VII is the Town portion of street reconstruction, it appears the applicant will be responsible for half the cost of street reconstruction. How did the applicant determine this cost share? Did the applicant consult the DNR [Street Reconstruction Cost Policy](#) during the determination?
6. The applicant estimated the costs for plant located on Hiawatha Island separately in Attachment 8 PART B ([PSC REF#: 562549](#), pages 91-92.) at \$1,738,500, plus \$604,250 in street repairs, for a total of \$2,342,750. What portion of the total street repairs will the applicant be responsible for? Explain how the applicant determined this cost share and clarify if it included the DNR policy during the process.
7. Water utilities generally extend service to new customers by having the customers pay for the water mains. Explain why the applicant did not levy special assessments for the water mains.
8. Standard water utility rates and rules include Schedule Cz-1, which establishes a Water Lateral Installation Charge that requires that the customer pay the actual cost of installing a water service lateral from the main through curb stop and box. Explain why the applicant is not applying this standard rate.
9. The applicant did not complete the supplemental questions in Section F of the application “Supplemental Questions – Utility Buildings.” Please only answer questions nos. 1, 2, and 6.
10. Since the applicant is establishing rates for the first time for this water system, supply the information requested in Section B “Supplemental Questions – Establish New Utility.”
 - a. Item Nos. 4 – 11
 - b. Item Nos. 15 and 16
 - c. Item No. 18
11. In Table 2.7 of the engineering report that the applicant submitted as part of Attachment 8 PART A ([PSC REF#: 562548](#), page 26), the applicant estimated 132 Multifamily customers. Provide a grouping of these customers by number of units in the building such as 50 eight-unit buildings, 50 twelve-unit buildings, and 32 twenty-unit buildings.
12. Does the applicant plan to have a municipal public fire protection (PFP) charge or direct PFP charges? An overview of PFP charges can be found here: [PSC Public Fire Protection](#).
13. In Part VII of application, the applicant estimated annual operating expenses of \$396,000, which appears low. Please answer the following questions:
 - a. As instructed in Section B “Supplemental Questions – Establish New Utility”, the estimated costs should be for the third year of operations.
 - b. Based on the PSC Annual Reports, similar sized water utilities in Wisconsin reported an average of \$550,000 in operating expenses in 2024. If this is increased by inflation, it would be about \$625,000 in 2029. Provide an adjusted estimate.
 - c. The applicant did not estimate any labor in Account 600-906. Provide an estimate accordingly.

- d. The applicant did not estimate any expenses in the Transmission and Distribution category or the Customer Accounts category. Provide an estimate accordingly.
 - e. Provide the individual mill rates and the assessment ratio from the most recent tax bills.
 - f. Does the Town plan to charge the maximum payment in lieu of taxes expense to the applicant? If not, what amount does the Town plan to charge?
14. Does the applicant plan to request the benchmark rate of return (ROR), currently 6.70 percent, in the rate case to set initial rates? If not, what ROR does the applicant plan to request?
 15. Provide the estimated timeline for incorporation of the Town to the Village of French Island.
 16. Is the applicant requesting approval for the construction of a third well, Well No. 3 in this docket? If so, provide the location of Well No. 3 and the associated environmental impacts.
 17. The application states “Phase 2B will consist of the construction of the Pumphouse/Treatment No. 1 and Well No. 2.” Does numbering the pumphouse/treatment “No. 1” indicate that there may be a second pumphouse/treatment for Well No. 2?
 18. Section IV (3) of the application lists “well site sewer upgrades.” Clarify if this refers only to construction connecting the pumphouse restroom to the existing sewer system. Clarify if this docket includes other additions to the existing sanitary sewer system. If it does, provide the environmental impacts associated with those activities.
 19. The 2025 Phase I archeological survey includes reference to “a possible easement across two residential lots for the loop on Bayshore Drive,” “The relocated Marina Drive,” and “The riverbank at Hinkley Road extended for the alternate river crossing.” ([PSC REF#: 562552](#), page 30.) Clarify if these activities should be considered for approval in this docket.
 20. Confirm whether construction in the area described as “a possible easement across two residential lots for the loop on Bayshore Drive” will impact or occur within the boundaries of archaeological site LC-0017. Provide details about the depth of the pipe and location of bore pits for construction in this general area to determine whether an archaeological monitor would be required at that location.
 21. Confirm if the applicant would obtain a permit from the WI Historical Society before any construction impacting archeological and burial site 47LC476/BLC-0126 (Area 5).
 22. State whether the applicant plans to utilize an archaeological monitor during construction in areas identified as areas of high archeological potential and described as Areas A, B, and C on pages 11-12 of the September 2000 Land Use History Report by M.V.A.C.