

WPPI Energy

FINANCIAL STATEMENTS

Including Independent Auditors' Report

As of and for the Years Ended December 31, 2021 and 2020

WPPI Energy

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December 31, 2021 and 2020

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Independent Auditors' Report

To the Board of Directors of
WPPI Energy

Opinion

We have audited the accompanying financial statements of WPPI Energy, as of and for the years ended December 31, 2021 and 2020 and the related notes to the financial statements, which collectively comprise WPPI Energy's basic financial statements as listed in the table of contents.

In our opinion, the financial statements referred to above present fairly, in all material respects, the financial position of WPPI Energy as of December 31, 2021 and 2020 and the changes in financial position and cash flows for the years then ended in accordance with accounting principles generally accepted in the United States of America.

Basis for Opinion

We conducted our audit in accordance with auditing standards generally accepted in the United States of America (GAAS). Our responsibilities under those standards are further described in the Auditors' Responsibilities for the Audit of the Financial Statements section of our report. We are required to be independent of WPPI Energy and to meet our other ethical responsibilities, in accordance with the relevant ethical requirements relating to our audit. We believe that the audit evidence we have obtained is sufficient and appropriate to provide a basis for our audit opinion.

Responsibilities of Management for the Financial Statements

Management is responsible for the preparation and fair presentation of the financial statements in accordance with accounting principles generally accepted in the United States of America; and for the design, implementation and maintenance of internal control relevant to the preparation and fair presentation of financial statements that are free from material misstatement, whether due to fraud or error.

In preparing the financial statements, management is required to evaluate whether there are conditions or events, considered in the aggregate, that raise substantial doubt about WPPI Energy's ability to continue as a going concern for twelve months beyond the financial statement date, including any currently known information that may raise substantial doubt shortly thereafter.

Auditors' Responsibilities for the Audit of the Financial Statements

Our objectives are to obtain reasonable assurance about whether the financial statements as a whole are free from material misstatement, whether due to fraud or error and to issue an auditors' report that includes our opinions. Reasonable assurance is a high level of assurance but is not absolute assurance and therefore is not a guarantee that an audit conducted in accordance with GAAS will always detect a material misstatement when it exists. The risk of not detecting a material misstatement resulting from fraud is higher than for one resulting from error, as fraud may involve collusion, forgery, intentional omissions, misrepresentations or the override of internal control. Misstatements are considered material if there is a substantial likelihood that, individually or in the aggregate, they would influence the judgment made by a reasonable user based on the financial statements.

In performing an audit in accordance with GAAS, we:

- Exercise professional judgment and maintain professional skepticism throughout the audit.
- Identify and assess the risks of material misstatement of the financial statements, whether due to fraud or error and design and perform audit procedures responsive to those risks. Such procedures include examining, on a test basis, evidence regarding the amounts and disclosures in the financial statements.
- Obtain an understanding of internal control relevant to the audit in order to design audit procedures that are appropriate in the circumstances, but not for the purpose of expressing an opinion on the effectiveness of WPPI Energy's internal control. Accordingly, no such opinion is expressed.
- Evaluate the appropriateness of accounting policies used and the reasonableness of significant accounting estimates made by management, as well as evaluate the overall presentation of the financial statements.
- Conclude whether, in our judgment, there are conditions or events, considered in the aggregate, that raise substantial doubt about WPPI Energy's ability to continue as a going concern for a reasonable period of time.

We are required to communicate with those charged with governance regarding, among other matters, the planned scope and timing of the audit, significant audit findings and certain internal control-related matters that we identified during the audit.

Required Supplementary Information

Accounting principles generally accepted in the United States of America require that the required supplementary information, as listed in the table of contents be presented to supplement the basic financial statements. Such information is the responsibility of management and, although not a part of the basic financial statements, is required by the Governmental Accounting Standards Board who considers it to be an essential part of financial reporting for placing the basic financial statements in an appropriate operational, economic or historical context. We have applied certain limited procedures to the required supplementary information in accordance with auditing standards generally accepted in the United States of America, which consisted of inquiries of management about the methods of preparing the information and comparing the information for consistency with management's responses to our inquiries, the basic financial statements and other knowledge we obtained during our audit of the basic financial statements. We do not express an opinion or provide any assurance on the information because the limited procedures do not provide us with sufficient evidence to express an opinion or provide any assurance.

Baker Tilly US, LLP

Madison, Wisconsin
February 23, 2022

MANAGEMENT'S DISCUSSION AND ANALYSIS

This discussion and analysis of WPPI Energy's (WPPI) condensed financial statements provides an overview of WPPI's activities for the years ended December 31, 2021 and 2020. The information presented should be read in conjunction with WPPI's financial statements and the accompanying notes.

WPPI follows authoritative sources of U. S. generally accepted accounting principles (GAAP) under the provisions of Governmental Accounting Standards Board (GASB) 76, *The Hierarchy of Generally Accepted Accounting Principles for State and Local Governments*. WPPI complies with all applicable GASB pronouncements, including the application of GASB 62, *Codification of Accounting and Financial Reporting Guidance Contained in Pre-November 30, 1989 FASB and AICPA Pronouncements* (GASB 62).

WPPI's financial statements include the following: The Statements of Net Position provides information about the nature and amount of assets, deferred outflows of resources, liabilities and deferred inflows of resources of WPPI as of the end of the year. The Statements of Revenues, Expenses, and Changes in Net Position reports and classifies revenues, expenses and outflows and inflows of resources for the year. The Statements of Cash Flows reports and classifies cash receipts, cash payments and net changes in cash for the year. The notes to the financial statements provide additional information.

Significant Events

WPPI had several significant events occur in 2021 and 2020. The following is a description of these events and their impact on WPPI's financial statements and the accompanying notes.

2021

Market Conditions

The second half of 2021 saw sustained increases in natural gas prices and market energy prices in the Midcontinent Independent System Operator, Inc. (MISO) wholesale energy market. As a result of these higher prices in the wholesale energy market, along with higher megawatt hour (MWh) energy sales to members, WPPI experienced an increase in both operating revenues and operating expenses in 2021 compared to 2020. Higher operating expenses were primarily the result of (i) higher wholesale market energy prices, (ii) higher energy true-ups paid under certain purchased power agreements and (iii) increases in fuel and operation and maintenance expenses associated with WPPI's generating units overall increased production in 2021 compared to 2020.

In February 2021, a winter weather event caused extreme and sustained cold temperatures throughout the central portion of the United States that impacted demand for electricity and disrupted electrical generation performance and fuel availability, particularly in Texas and surrounding areas. The resulting spike in natural gas prices drove MISO market energy prices higher for which WPPI pays and receives for its load and power supply resources respectively. WPPI's power supply resources performed well throughout this event, and as a result, WPPI's average revenue collected from members during February was very close the expected level.

WPPI's megawatt hour (MWh) energy sales to members were 3.2% higher in 2021 compared to 2020, returning closer to pre-COVID-19 levels experienced in 2019 with improved industrial and commercial activity. In addition, summer weather was slightly warmer in 2021 compared to 2020. Higher market energy prices also contributed to higher dispatch of WPPI's generating units and higher revenue from sales to others in 2021 compared to 2020. The application of certain refunds in 2020, as described below, also impacted the increase in WPPI's power costs in 2021.

Power Supply Updates

Effective September 13, 2021, WPPI began purchasing all the output from the Point Beach Solar Energy Center under a purchase power agreement with NextEra. Point Beach Solar Energy Center is a 100 MW photovoltaic solar energy generating facility located in Manitowoc County, Wisconsin. The initial term runs through May 31, 2042.

Through the designation of earnings and pre-expensing expected maintenance activities, WPPI accumulates monies in the renewal and replacement fund for use in funding future planned capital and maintenance projects at WPPI's owned generating units. The balance in the renewal and replacement fund was \$25.0 million and \$32.9 million at December 31, 2021 and 2020, respectively. The decrease of \$7.9 million in 2021 compared to 2020 was due primarily to performing several planned capital and maintenance projects at WPPI's owned generating units in 2021. Among the projects, (i) a steam turbine overhaul and hot reheat piping replacement was completed at Boswell Unit 4, (ii) a steam generator overhaul and other work was completed at Elm Road Generating Station Unit 1 and (iii) a gas turbine overhaul is in progress at South Fond du Lac Unit 1. As a result, WPPI's unrestricted cash and investments decreased and the production at these owned generating units was impacted by the outages needed to perform these projects.

Refunds

As a result of proceedings related to return on equity (ROE) complaints at the Federal Energy Regulatory Commission (FERC), WPPI received \$1.4 million in refunds, including interest, for certain transmission service charges previously paid. The regulatory asset recorded at the end of 2020 in the amount of \$1.3 million was extinguished and WPPI's unrestricted cash and investments increased. WPPI will apply \$0.1 million of refunds in excess of the \$3.1 million already applied in 2020 to reduce recoverable costs to members in 2022.

2020

COVID-19 Impacts

In March 2020, the World Health Organization characterized a novel coronavirus, known as COVID-19, as a global pandemic. WPPI developed a response plan and implemented various measures including performing work from home to the extent possible. WPPI's operations have continued uninterrupted through the pandemic with no material change in service.

WPPI's MWh energy sales to members were 3.5% lower in 2020 compared to 2019. The change in MWh energy sales to members was impacted from the effects of COVID-19 and warmer summer weather experienced in 2020 compared to 2019. In response to projected COVID-19 impacts, WPPI's Board of Directors approved application of anticipated transmission-related refunds, as described below, to flow through to members and their customers through the power cost adjustment clauses to provide timely rate relief during the summer of 2020.

In addition, members approved use of excess WPPI funds to assist local organizations in their communities in addressing the local health and economic impacts of COVID-19. The COVID-19 Community Recharge initiative established by WPPI provided \$0.5 million to support relief efforts across the WPPI membership in 2020.

Refunds

WPPI applied \$3.1 million of anticipated transmission-related refunds to reduce recoverable costs to members in 2020. This lowered transmission expense and provided rate relief to members and their customers in offsetting higher demand charges during the months of July and August. As a result of proceedings related to ROE complaints at FERC, WPPI received \$1.8 million in refunds, including interest, for certain transmission service charges previously paid. WPPI recorded a regulatory asset of \$1.3 million to reflect the difference between the \$3.1 million returned to members and the \$1.8 million received in 2020, which decreased WPPI's unrestricted cash and investments.

Market Conditions

Overall weather conditions remained mild in 2020 with warmer summer weather compared to 2019. The low market conditions that occurred in 2019 were driven further lower in 2020 by lower natural gas prices, higher wind output and lower peak and average load across the Midcontinent Independent System Operator, Inc. footprint impacted by COVID-19.

Lower MWh energy sales to members, as described above, resulted in lower revenue from member sales in 2020 compared to 2019. Lower market energy prices also contributed to lower dispatch of WPPI's generating units and lower revenue from sales to others in 2020 compared to 2019. While lower market conditions resulted in lower operating revenue for WPPI, it also contributed to lower operating expenses through lower market and contract energy costs along with decreases in fuel expense and operation and maintenance associated with WPPI's generating units overall production in 2020 compared to 2019.

WPPI also realized decreases in administrative & general costs in 2020 due primarily to lower pension expense associated with the Wisconsin Retirement System (WRS) and performing work from home through lower meeting, travel and other related expenses. Lastly, lower debt service, as described below, also impacted the WPPI's power costs in 2020.

Condensed Statements of Net Position
(in millions)

	2021	2020	2019	2021- 2020 Change	2020- 2019 Change
Assets					
Current assets	\$ 150.8	\$ 139.9	\$ 140.7	\$ 10.9	\$ (0.8)
Non-current assets	267.5	272.1	261.7	(4.6)	10.4
Capital assets, net	<u>354.1</u>	<u>361.5</u>	<u>373.4</u>	<u>(7.4)</u>	<u>(11.9)</u>
Total assets	772.4	773.5	775.8	(1.1)	(2.3)
Deferred Outflows of Resources	20.4	20.1	23.7	0.3	(3.6)
Liabilities					
Current liabilities	58.6	51.2	55.7	7.4	(4.5)
Non-current liabilities	9.9	10.1	12.6	(0.2)	(2.5)
Long-term debt, including unamortized premium	<u>303.8</u>	<u>324.5</u>	<u>343.3</u>	<u>(20.7)</u>	<u>(18.8)</u>
Total liabilities	372.3	385.8	411.6	(13.5)	(25.8)
Deferred Inflows of Resources	92.0	90.2	84.1	1.8	6.1
Net Position	328.5	317.6	303.8	10.9	13.8

Assets & Deferred Outflows of Resources

Total assets at the end of 2021 were \$772.4 million which was a decrease of \$1.1 million from 2020. Total assets at the end of 2020 were \$773.5 million which was a decrease of \$2.3 million from 2019.

Current assets increased \$10.9 million in 2021 due primarily to higher receivables from sales to members and non-members. Current assets decreased \$0.8 million in 2020 due primarily to applying certain refunds to recoverable costs to members in 2020. The change in current assets in 2020 was also impacted by reclassification to non-current assets for certain monies moved to the renewal and replacement fund, continued construction fund spend and voluntary capital calls made to ATC.

Non-current assets decreased \$4.6 million in 2021 due primarily to use of the renewal and replacement fund for certain planned maintenance projects at WPPI's owned generating units. This was partially offset by increases in WPPI's investment in ATC. Non-current assets increased \$10.4 million in 2020 due primarily to increases in

WPPI's investment in ATC, reserve funds and aforementioned regulatory assets. WPPI made capital contributions to ATC to meet voluntary capital calls of \$2.4 million in 2020. There were no voluntary capital calls in 2021. The change in non-current assets in 2021 and 2020 was also impacted by WPPI's proportionate share of the net pension amount of the WRS. Recognized as a net pension liability in 2019, this item was subsequently recognized as a net pension asset in 2020, which increased in 2021.

Capital assets net of accumulated depreciation decreased \$7.4 million in 2021 and \$11.9 million in 2020 as a result of annual depreciation exceeding capital additions. Construction work in progress increased \$3.3 million in 2021 and \$2.2 million in 2020, and consisted primarily of various capital projects at Boswell Unit 4.

Deferred outflows of resources increased \$0.3 million in 2021 due primarily to higher pension-related amounts associated with the WRS offset by ongoing amortization of loss on reacquired debt and asset retirement obligations. Deferred outflows of resources decreased \$3.6 million in 2020 due primarily to ongoing amortization of loss on reacquired debt and asset retirement obligations along with lower pension-related amounts associated with the WRS.

Liabilities & Deferred Inflows of Resources

Current liabilities increased \$7.4 million in 2021 due primarily to higher payables from purchased power and higher current maturities of long-term debt. Current liabilities decreased \$4.5 million in 2020 due primarily to lower current maturities of long-term debt.

Non-current liabilities decreased \$0.2 million in 2021 and \$2.5 million in 2020. The change in non-current liabilities in 2020 was due primarily to the change in classification in 2020 of WPPI's aforementioned proportionate share of the net pension amount of the WRS. In 2020, WPPI's asset retirement obligations decreased due primarily to an updated asset retirement study at Boswell Unit 4, which was partially offset by an increase in WPPI's other postemployment benefits liability.

Long-term debt including unamortized premium decreased \$20.7 million in 2021 and \$18.8 million in 2020 due to the reclassification of certain long-term debt to current maturities and the amortization of premium.

Deferred inflows of resources increased \$1.8 million in 2021 and \$6.1 million in 2020 due primarily to higher future recoverable costs and pension-related amounts associated with the WRS. Higher future recoverable costs in 2021 and 2020 resulted from principal amounts recovered in rates exceeding the related depreciation and amortization recognized. The change in deferred inflows of resources in 2021 was also impacted by the aforementioned use of the renewal and replacement fund.

Net Position

Net position was \$328.5 million at the end of 2021 and \$317.6 million at the end of 2020. The change in net position results primarily from margin collected through WPPI's wholesale rates to its members and WPPI's share of ATC earnings that are retained by ATC.

Condensed Statements of Revenues, Expenses, and Changes in Net Position
(in millions)

	2021	2020	2019	2021- 2020 Change	2020- 2019 Change
Operating revenues	\$472.4	\$411.8	\$429.5	\$ 60.6	\$ (17.7)
Operating expenses	462.1	401.4	418.8	60.7	(17.4)
Operating income	10.3	10.4	10.7	(0.1)	(0.3)
Non-operating revenues (expenses), net	1.7	5.4	6.3	(3.7)	(0.9)
Future recoverable costs	(1.1)	(2.0)	(3.6)	0.9	1.6
Change in net position	10.9	13.8	13.4	(2.9)	0.4
Net position, beginning of year	317.6	303.8	291.7	13.8	12.1
Cumulative effect of change in accounting principle	-	-	(1.3)	-	1.3
Net position, end of year	<u>\$328.5</u>	<u>\$317.6</u>	<u>\$303.8</u>	<u>\$ 10.9</u>	<u>\$ 13.8</u>

Operating Revenues

Operating revenues in 2021 were \$472.4 million, which was an increase of \$60.6 million from 2020. Higher operating revenues in 2021 was due to higher revenue from sales to members from both increases in revenue per MWh energy sold and total MWh energy sold to members, along with higher revenue from sales to others. Operating revenues in 2020 were \$411.8 million, which was a decrease of \$17.7 million from 2019. Lower operating revenues in 2020 was due to lower revenue from sales to others along with lower MWh energy sales to members and associated revenue.

Revenue from energy sales to members increased \$32.0 million in 2021 due primarily to passing higher power costs on to members through WPPI's wholesale rate, including the power cost adjustment clause, and higher MWh energy sales to members. Revenue from energy sales to members decreased \$7.4 million in 2020 due primarily to lower MWh energy sales and passing lower power costs on to its members through WPPI's wholesale rate, including the power cost adjustment clause.

Energy Sales to Members (MWh)

	2021	2020	2019	% Change 2021- 2020	% Change 2020- 2019
Energy sales to members	4,924,645	4,772,322	4,942,894	3.2%	-3.5%

WPPI's MWh energy sales to members was lower in 2020 compared to 2021 and 2019 due primarily from the impacts of COVID-19.

Revenue from sales to others increased \$28.3 million in 2021 and decreased \$11.4 million in 2020. The change in revenue from sales to others in 2021 and 2020 was due primarily to the relative level of market energy prices and the availability and dispatch of WPPI's power supply resources. Revenue from sales to others includes

revenue from WPPI's owned transmission, consisting of the CapX 2020 La Crosse project and the Badger-Coulee project, which was \$2.8 million in 2021 and \$3.0 million in 2020.

Operating Expenses

Operating expenses were \$462.1 million in 2021, which was an increase of \$60.7 million from 2020. Operating expenses were \$401.4 million in 2020, which was a decrease of \$17.4 million from 2019. The change in operating expenses in 2021 and 2020 was due primarily to changes in purchased power, transmission and fuel expense.

Purchased power expense increased \$46.2 million in 2021 due primarily to higher market energy costs and higher MWh sales to members. Purchased power expense decreased \$9.6 million in 2020 due primarily to lower market energy costs and lower MWh sales to members. Lower energy costs under certain purchased power agreements and the application of certain refunds of purchased power costs previously paid also impacted the change in purchased power expense in 2020 compared to 2019.

Transmission expense increased by \$8.0 million in 2021 and decreased by \$0.5 million in 2020. The change in transmission expense was due primarily higher transmission service charges in 2021 and recognizing certain refunds in 2020 of transmission service charges previously paid.

Fuel expense increased \$5.2 million in 2021 due primarily to higher fuel prices and higher total production at WPPI's owned generating units. Fuel expense decreased \$5.0 million in 2020 due primarily to lower operational fuel costs and lower total production at WPPI's owned generating units.

Owned Generation Production by Unit (MWh)

				%	%
				Change	Change
	2021	2020	2019	2021- 2020	2020- 2019
Boswell Unit 4	594,881	529,895	650,971	12.3%	-18.6%
ERGS Unit 1	292,162	369,250	364,791	-20.9%	1.2%
ERGS Unit 2	351,957	277,407	333,424	26.9%	-16.8%
SFDL Units 1 and 4	28,899	13,492	12,438	114.2%	8.5%
ISPP	12,815	2,693	7,921	375.9%	-66.0%
Total	<u>1,280,714</u>	<u>1,192,737</u>	<u>1,369,545</u>	<u>7.4%</u>	<u>-12.9%</u>

The production at Boswell Unit 4 was lower in 2020 compared to 2021 and 2019 due primarily to higher outage hours and lower dispatch as a result of lower market energy prices in 2020. Boswell Unit 4 was offline for approximately eleven and half weeks during the second quarter of 2021 for a planned outage for a turbine overhaul and hot reheat steam piping replacement. Boswell Unit 4 was offline for approximately six and a half weeks during the first quarter of 2019 for an unplanned outage to repair numerous leaks in the hot reheat steam piping.

The production at ERGS Unit 1 was lower in 2021 compared to 2020 and 2019 due primarily to being offline for approximately eleven and half weeks during the fourth quarter of 2021 for a planned outage for a major steam turbine generator overhaul and other work.

The production at ERGS Unit 2 was lower in 2020 compared to 2021 and 2019 due primarily to higher outage hours, including extension of a planned outage from five to twelve weeks to replace all four turbine control valve

seats. ERGS Unit 2 was offline for approximately six and a half weeks during the second quarter of 2019 for a planned turbine valve outage.

The production at South Fond du Lac (SF DL) Units 1 and 4 and ISPP has varied the last several years due to changes in generation dispatch patterns in the market footprint of MISO. SF DL Unit 1 was taken offline near the end of the third quarter of 2021 for a planned outage for a gas turbine overhaul. A return to service is currently estimated in the second quarter of 2022.

Non-Operating Revenues (Expenses), Net

Net non-operating revenues decreased \$3.7 million and \$0.9 million in 2021 and 2020, respectively. In 2021, the decrease was due primarily to lower investment income and the change in the fair market value of investments. In 2020, the decrease was impacted by expenses related to WPPI's COVID-19 Community Recharge initiative. The decrease in 2021 and 2020 was partially offset by lower interest expense. Investment income includes ATC earnings distributed as cash dividends that were used to lower the wholesale rate paid by members.

Interest expense decreased \$0.8 million and \$1.0 million in 2021 and 2020, respectively, as WPPI's outstanding debt decreased in both years.

Future Recoverable Costs

As allowed through the application of GASB 62, future recoverable costs represent the difference between depreciation and amortization expenses for assets that are financed with bond proceeds and the related principal collected from rates in the present period. Future recoverable costs equaled \$(1.1) million in 2021, a change of \$0.9 million from 2020. Future recoverable costs equaled \$(2.0) million in 2020, a change of \$1.6 million from 2019.

Contact Information

This financial report is designed to provide a general overview of WPPI's finances. Questions or requests for additional information should be addressed to:

WPPI Energy
Attn: CFO
1425 Corporate Center Drive
Sun Prairie, Wisconsin 53590

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WPPI Energy
Statements of Net Position
December 31, 2021 and 2020

	2021	2020
Assets		
Current assets		
Unrestricted cash and investments	\$ 76,094,052	\$ 74,846,829
Restricted cash and investments	15,632,597	14,961,472
Receivables	44,256,518	34,476,143
Inventories	11,277,041	12,589,490
Prepayments and other assets	3,583,733	3,030,670
Total current assets	150,843,941	139,904,604
Non-current assets		
Unrestricted cash and investments	82,796,068	91,854,127
Restricted cash and investments	25,579,714	26,705,098
Investment in ATC	148,260,274	144,720,029
Receivables	3,108,045	2,993,182
Regulatory assets	3,142,492	3,090,277
Prepayments and other assets	493,410	675,926
Restricted net pension asset	4,166,180	2,110,138
Total non-current assets	267,546,183	272,148,777
Capital assets		
Electric plant and equipment	578,484,976	575,416,372
Accumulated depreciation and amortization	(234,996,082)	(221,257,628)
Electric plant and equipment, net	343,488,894	354,158,744
Land	1,349,703	1,351,215
Construction work in progress	9,251,754	5,962,642
Total capital assets	354,090,351	361,472,601
Total assets	772,480,475	773,525,982
Deferred Outflows of Resources		
Unamortized loss on reacquired debt	11,112,270	12,609,771
Other postemployment benefits	708,770	643,322
Pension	6,937,626	4,943,492
Asset retirement obligation	1,639,180	1,858,803
Total deferred outflows of resources	20,397,846	20,055,388

WPPI Energy
Statements of Net Position (cont'd)
December 31, 2021 and 2020

	2021	2020
Liabilities		
Current liabilities		
Accounts payable and accrued liabilities	\$ 34,497,457	\$ 28,796,189
Restricted current maturities of long-term debt	16,940,000	14,855,000
Restricted accrued interest	7,162,597	7,533,972
Total current liabilities	58,600,054	51,185,161
Non-current liabilities		
Asset retirement obligations	6,322,606	6,758,476
Other postemployment benefits	2,812,957	2,500,046
Other benefits liabilities	791,727	848,536
Total non-current liabilities	9,927,290	10,107,058
Long-term debt		
Revenue bonds, net of unamortized premium	303,846,599	324,492,646
Total liabilities	372,373,943	385,784,865
Deferred Inflows of Resources		
Rate stabilization	47,000,936	47,000,936
Pension	9,378,632	6,832,652
Other postemployment benefits	78,469	86,755
Regulatory credits	35,510,815	36,310,041
Total deferred inflows of resources	91,968,852	90,230,384
Net Position		
Net investment in capital assets	39,720,809	29,795,264
Restricted		
Debt service	8,470,000	7,427,500
Debt service reserve	25,578,692	26,704,076
Net pension asset	4,166,180	2,110,138
Other	1,022	1,022
Unrestricted	250,598,823	251,528,121
Total net position	328,535,526	317,566,121

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WPPI Energy
Statements of Revenue, Expenses, and Changes in Net Position
For the Years Ended December 31, 2021 and 2020

	2021	2020
Operating revenues		
Sales to members	\$ 373,911,610	\$ 341,903,199
Sales to others	95,878,044	67,604,220
Other income	2,637,473	2,292,329
Total operating revenues	472,427,127	411,799,748
Operating expenses		
Purchased power	305,114,278	258,873,521
Transmission	70,217,066	62,211,898
Fuel expense	29,055,143	23,876,720
Operation and maintenance	16,247,756	14,406,765
Customer service and administrative and general	18,067,679	18,662,785
Depreciation and amortization	17,037,106	16,822,046
Taxes	6,338,485	6,545,886
Total operating expenses	462,077,513	401,399,621
Operating income	10,349,614	10,400,127
Non-operating revenues (expenses)		
Investment income	11,105,760	12,850,541
Equity in earnings of ATC	3,540,245	3,693,110
Net increase (decrease) in fair value of investments	(1,857,009)	1,241,862
Gain on sale of allowances	1,768,005	1,623,157
Interest expense	(14,703,505)	(15,533,898)
Amortization of debt-related costs	2,016,925	2,095,369
Other	(124,083)	(557,783)
Total non-operating revenues (expenses), net	1,746,338	5,412,358
Future recoverable costs	(1,126,547)	(2,036,351)
Change in net position	10,969,405	13,776,134
Net position, beginning of year	317,566,121	303,789,987
Net position, end of year	\$ 328,535,526	\$ 317,566,121

WPPI Energy
Statements of Cash Flows
Years Ended December 31, 2021 and 2020

	2021	2020
Cash flows provided by operating activities		
Cash receipts from members and others	\$ 464,116,344	\$ 412,471,807
Cash payments for purchased power	(371,099,975)	(322,284,736)
Cash payments for fuel	(27,762,816)	(24,308,362)
Cash payments for operations and maintenance	(14,852,038)	(10,974,262)
Cash payments for payroll and ad valorem taxes	(6,338,474)	(6,556,071)
Cash payments to employees	(11,796,492)	(11,463,097)
Cash payments for customer service & adm. and general	(10,314,934)	(10,202,911)
Net cash provided by operating activities	21,951,615	26,682,368
Cash flows provided by non-capital financing activities		
Cash receipts from outside parties	1,352,496	1,056,760
Cash payments to outside parties	(1,319,139)	(856,771)
Net cash provided by non-capital financing activities	33,357	199,989
Cash flows provided by investing activities		
Investments purchased	(79,087,051)	(75,771,132)
Investment in ATC	-	(2,352,803)
Investments sold	84,462,845	79,567,316
Investment income	2,129,136	3,432,592
Cash distributions received from ATC	9,322,120	10,201,597
Net cash provided by investing activities	16,827,050	15,077,570
Cash flows used in capital and related financing activities		
Acquisition and construction of capital assets	(9,772,699)	(4,973,938)
Principal paid	(14,855,000)	(18,930,000)
Interest paid	(15,074,880)	(16,007,148)
Net cash used in capital and related financing activities	(39,702,579)	(39,911,086)
Change in cash and cash equivalents	(890,557)	2,048,841
Cash and cash equivalents, beginning of year	94,015,099	91,966,258
Cash and cash equivalents, end of year	\$ 93,124,542	\$ 94,015,099

WPPI Energy
Statements of Cash Flows (cont'd)
Years Ended December 31, 2021 and 2020

	2021	2020
Reconciliation of operating income to net cash provided by operating activities		
Operating income	\$ 10,349,614	\$ 10,400,127
Depreciation and amortization	17,037,106	16,822,046
Other non-operating revenues (expenses), net	1,676,275	1,037,710
Changes in assets, liabilities, deferred outflows and inflows of resources		
Receivables	(10,104,677)	(996,597)
Inventories	1,312,448	(1,035,123)
Prepayments and other assets	(398,906)	268,849
Regulatory asset	(397,993)	(1,546,731)
Non-current prepayments and other assets	(1,873,526)	(1,918,576)
Pension	486,398	1,342,437
Accounts payable and accrued liabilities	5,587,009	375,129
Other postemployment benefits	304,625	716,944
Other benefits liabilities	(56,809)	105,109
Regulatory credits	(1,969,949)	1,111,044
Net cash provided by operating activities	\$ 21,951,615	\$ 26,682,368

Reconciliation of cash and cash equivalents to the Statements of Net Position

Current assets

Unrestricted cash and investments	\$ 76,094,052	\$ 74,846,829
Restricted cash and investments	15,632,597	14,961,472

Non-current assets

Unrestricted cash and investments	82,796,068	91,854,127
Restricted cash and investments	25,579,714	26,705,098
Total cash and investments	200,102,431	208,367,526
Less: long-term investments	106,977,889	114,352,427
Total cash and cash equivalents	\$ 93,124,542	\$ 94,015,099

WPPI Energy
Statements of Cash Flows (cont'd)
Years Ended December 31, 2021 and 2020

Noncash investing, capital and related-financing activities

During 2021 and 2020, WPPI Energy recognized \$3,540,245 and \$3,693,110 of equity earnings in ATC.

During 2021, WPPI Energy recognized a decrease in fair market value of investments of \$1,857,010.

During 2020, WPPI Energy recognized an increase in fair market value of investments of \$1,241,862.

NOTES TO THE FINANCIAL STATEMENTS

(1) Summary of Significant Accounting Policies

(a) Organization and Operations

WPPI Energy (WPPI) is a municipal electric company and political subdivision of the State of Wisconsin, formed in 1980. It is WPPI's mission to help member utilities accomplish more by working together for reliable, affordable, responsible electricity, forward-thinking services and effective advocacy. WPPI sells wholesale power to its 41 Wisconsin municipal members and 9 non-Wisconsin municipal members. WPPI also sells wholesale electricity under a long-term contract to a Michigan electric cooperative association. Including the Michigan electric cooperative association, WPPI served 51 customer-owned electric utilities (the "members") as of December 31, 2021 and 2020, respectively.

WPPI sells wholesale electricity to its members under long-term contracts. As of December 31, 2021, 50 members, representing approximately 99.8% of WPPI's existing load, have long-term contracts through December 31, 2055. The remaining member has a long-term contract through December 31, 2037. Under the long-term contracts, WPPI has agreed to sell and deliver to each member, and each member has agreed to take and pay for all of its electric power requirements, with certain exceptions related to existing member-owned hydroelectric facilities and other specified generation. WPPI supplies the electric power requirements of its members from a mix of resources, including owned generation and purchased power from other entities including the Midcontinent Independent System Operator, Inc. (MISO) and PJM Interconnection, LLC (PJM) markets and as described in Note 1(n), Note 1(u) and Note 11, respectively. WPPI also receives operating revenues from sales of capacity and energy to other entities including sales in the MISO and PJM markets.

WPPI offers various member utility services and customer programs, including, but not limited to: advanced metering, customer information system, retail billing and tariff compliance, electric rate studies and financial modeling, customer engagement, program marketing, website development, distribution system support, shared meter technician, lineman construction maintenance, cyber security and network support, joint purchasing of electric materials, government relations and advocacy, communications, incentives and loans, education, and community outreach.

(b) Basis of Accounting

WPPI follows authoritative sources of U.S. generally accepted accounting principles (GAAP) under the provisions of Governmental Accounting Standards Board (GASB) 76, *The Hierarchy of Generally Accepted Accounting Principles for State and Local Governments*. WPPI complies with all applicable GASB pronouncements, including the application of GASB 62, *Codification of Accounting and Financial Reporting Guidance Contained in Pre-November 30, 1989 FASB and AICPA Pronouncements* (GASB 62).

Under GASB 62, WPPI defers revenues and expenses for future recognition as they are recovered or returned through the rate-making process. Where applicable, the Federal Energy Regulatory Commission's (FERC) Uniform System of Accounts is used.

(c) Use of Estimates

The preparation of financial statements in conformity with U.S. GAAP requires management to make estimates and assumptions that affect the reported amounts of assets, liabilities and deferred outflows and inflows of resources and disclosure of contingent assets and liabilities at the date of the financial statements and the reported amounts of revenues, expenses and outflows and inflows of resources during the reporting period. Actual results could differ from those estimates.

(d) Fair Value Measurements

WPPI follows GASB 72, *Fair Value Measurement and Applications* for measuring fair value and reporting assets and liabilities measured at fair value within the fair value hierarchy.

(e) Cash and Investments

Cash and investments of WPPI's funds are governed by (i) Section 66.0825 of the Wisconsin Statutes, which states that notwithstanding the provision of any other law, WPPI may invest any funds held in reserve or sinking funds, or any funds not required for immediate disbursement in obligations, securities and other investments that it deems proper, and (ii) WPPI's bond resolution, which provides that such investments shall mature not later than such times as necessary to provide moneys when needed for payments from such funds.

(f) Cash and Cash Equivalents

For purposes of the Statements of Cash Flows, cash and cash equivalents are cash and investments maturing in three months or less.

(g) Restricted Cash and Investments

WPPI's bond resolution requires the segregation of bond proceeds and prescribes the application of WPPI's revenues. Amounts classified as restricted cash and investments on the Statements of Net Position represent cash and investments whose use is restricted by the bond resolution. It is WPPI's practice to use restricted funds on hand for their designated purpose, when available, before using unrestricted funds for such purpose.

(h) Current Receivables

Current receivables include sales accounts receivable, representing power sales to members and non-members for the period between the last billing date and the end of the reporting period, and are accrued in the period sold. Current receivable balances were as follows at December 31:

	2021	2020
Sales, members	\$ 35,496,855	\$ 26,895,684
Sales, non-members	5,214,019	3,727,010
Notes, members	881,437	1,016,456
ATC dividends	2,384,038	2,339,582
Unrestricted interest	252,571	469,530
Restricted interest	27,598	27,881
	<u>\$ 44,256,518</u>	<u>\$ 34,476,143</u>

(i) Non-Current Receivables

The non-current receivables balance includes amounts not due within the next year associated with member energy efficiency and renewable energy project loans.

(j) Inventories

Inventories include fuel and repair spare parts and are charged to plant or operation and maintenance expense at average cost when used. Inventories are valued at the lower of average cost or fair value.

(k) Prepayments and Other Assets

Prepayments and other assets include unamortized costs of expenses paid in advance for which the future benefits have yet to be realized. WPPI recognizes an expense or asset when such benefit is realized. Prepayments and other assets are for i) a member generation contract entered into in 2016, ii) other prepaid general operating costs, such as insurance and iii) upfront payments for community-based renewable energy purchased from members and their customers.

Prepayment and other asset balances were as follows at December 31:

	2021	2020
Capacity contract	\$ 632,764	\$ 797,523
Other general operating costs	3,401,217	2,839,108
Solar purchases	43,162	69,965
	<u>\$ 4,077,143</u>	<u>\$ 3,706,596</u>

For purposes of the Statements of Net Position, prepayments and other assets anticipated to be realized within one year are classified as current assets. Classification of prepayments and other assets was as follows on December 31:

	2021	2020
Current	\$ 3,583,733	\$ 3,030,670
Non-current	493,410	675,926
	<u>\$ 4,077,143</u>	<u>\$ 3,706,596</u>

(l) Regulatory Assets

Regulatory assets are for i) unamortized bond issuance costs to be recovered over the repayment period of the related bond issues, ii) the difference between the amount of refunds returned to members through rates in 2020 and the amount WPPI ultimately received in refunds in 2020 (see Note 11) and iii) refunds to be recovered through rates and returned to a member in 2022. Under GASB 65, *Items Previously Reported as Assets and Liabilities* (GASB 65), bond issuance costs are to be expensed in the period incurred. However, WPPI borrows for and systematically spreads the costs associated with issuing bonds over the life of the related bond issue for rate-making purposes using a method that approximates the effective-interest method. Regulatory asset balances were as follows at December 31:

	2021	2020
Unamortized bond issuance costs	\$ 1,627,393	\$ 1,819,015
Refunds returned not yet received	-	1,271,262
Refunds recoverable through future rates	1,515,099	-
	<u>\$ 3,142,492</u>	<u>\$ 3,090,277</u>

(m) Capital Assets

Additions to and replacements of capital assets are recorded at original cost, including allowance for borrowed funds. Assets with an initial cost greater than \$5,000 and a useful life of two years or more are capitalized. Depreciation is recorded using the straight-line method using service lives of 2 to 45 years.

(n) Owned Generation

WPPI had owned generation of approximately 431 MW at December 31, 2021 and 2020, respectively, from Boswell Unit 4, Elm Road Generating Station (ERGS) Units 1 and 2, South Fond du Lac (SFDL) Units 1 and 4, the Island Street Peaking Plant (ISPP) and other small generation. Generally, WPPI's share of the assets and the cost to operate and maintain its owned generation is included in the accompanying financial statements.

Boswell Unit 4. WPPI has a 20% undivided interest (approximately 117 MW) in the 585 MW Boswell Unit 4, a coal-fired steam unit near Grand Rapids, Minnesota. Minnesota Power owns the remaining interest in Boswell Unit 4 and is the operating agent responsible for operation and maintenance of the unit.

Elm Road Generating Station Units 1 and 2. WPPI has an 8.33% undivided interest (approximately 53 MW in each unit) in ERGS Units 1 and 2, two 634 MW supercritical coal-fired steam units near Oak Creek, Wisconsin. WEC Energy Group and MGE Energy, both through wholly owned subsidiaries, own the remaining 83.34% and 8.33% of ERGS Units 1 and 2, respectively. Wisconsin Electric Power Company (WEPCO) is the operating agent responsible for operation and maintenance of the units.

South Fond du Lac Units 1 and 4. WPPI owns two 77 MW combustion turbine units near Fond du Lac, Wisconsin. SFDL Units 1 and 4 are two of four combustion turbine units located on a site owned by Wisconsin Power & Light (WPL). WPL owns the other two units on the site and operates and maintains the units owned by WPPI.

Island Street Peaking Plant. WPPI owns a 52 MW combustion turbine unit in Kaukauna, Wisconsin. Kaukauna Utilities operates and maintains the unit.

(o) Owned Transmission

WPPI's transmission ownership consists of the CapX 2020 La Crosse project and the Badger-Coulee project. Generally, WPPI's share of the assets and cost to operate and maintain these transmission projects, along with associated transmission service revenue, is included in the accompanying financial statements (see Note 11). In addition, WPPI owns an equity interest in ATC Management Inc. and American Transmission Company LLC (collectively ATC) (see Note 3 and Note 11). WPPI takes service for all of its transmission requirements under contracts and tariffs approved by FERC.

CapX 2020 La Crosse project. WPPI has a 3% interest in the total CapX 2020 La Crosse project. However, WPPI's physical ownership of transmission consists only of facilities physically located in Wisconsin and amounts to approximately 9.5% of such facilities. The CapX 2020 La Crosse project is an approximate 125 mile 345 kV transmission line from Red Wing, Minnesota to the La Crosse, Wisconsin area. Five other utilities own the remaining interest in the CapX 2020 La Crosse project, including Xcel Energy, the operating agent responsible for operation and maintenance of the project. Electric plant and equipment, net balances for the CapX 2020 La Crosse project were as follows at December 31:

	2021	2020
Electric plant and equipment	\$ 15,348,275	\$ 15,348,275
Accumulated depreciation and amortization	<u>(2,529,739)</u>	<u>(2,141,298)</u>
Electric plant and equipment, net	<u>\$ 12,818,536</u>	<u>\$ 13,206,977</u>

Badger-Coulee project. WPPI has a 1.5% interest in the Badger-Coulee project. The Badger-Coulee project is a 345 kV transmission line that begins north of La Crosse where it interconnects with the CapX 2020 La Crosse project and runs approximately 180 miles to northern Dane County, also in Wisconsin. Four other utilities own the remaining interest in the Badger-Coulee project, including ATC and Xcel Energy, the operating agents responsible for operation and maintenance of the project. Electric plant and equipment, net balances for the Badger-Coulee project were as follows at December 31:

	2021	2020
Electric plant and equipment	\$ 7,172,480	\$ 7,189,274
Accumulated depreciation and amortization	<u>(569,284)</u>	<u>(403,581)</u>
Electric plant and equipment, net	<u>\$ 6,603,196</u>	<u>\$ 6,785,693</u>

(p) *Deferred Outflows and Inflows of Resources*

WPPI follows GASB 65 which reclassify as deferred outflows of resources or deferred inflows of resources or recognize outflows of resources or inflows of resources, certain items that were previously reported as assets and liabilities.

(q) *Pensions and Other Postemployment Benefits (OPEB)*

For purposes of measuring the net pension liability (asset) and total OPEB liability, related deferred outflows of resources and deferred inflows of resources, and related expense, information about fiduciary net position and additions to/deductions from its respective fiduciary net position have been determined on the same basis as they are reported by the Wisconsin Retirement System and the WPPI Post-Employment Benefit Plan, respectively. Benefit payments, including refunds of employee contributions, are recognized when due and payable in accordance with the benefit terms.

(r) *Derivative Instruments*

WPPI follows GASB 53, *Accounting and Financial Reporting for Derivative Instruments* (GASB 53) to recognize, measure and disclose information regarding its derivative instruments. WPPI may enter into derivative instruments to stabilize power costs to its members, consisting primarily of natural gas and electricity financial contracts. Under GASB 62, a regulatory asset or credit may be recorded as an offset to the net fair value of the hedging derivative instrument until settlement month is reached. WPPI did not hold any potential hedging derivatives at December 31, 2021 and 2020. All other power contracts fall under the normal purchases and sales exception within GASB 53, or are contracts where WPPI expects to take physical delivery of the power.

(s) *Regulatory Credits*

Regulatory credits are for i) amounts subject to refund in future periods for WPPI's share of the CapX 2020 La Crosse project and Badger-Coulee project (see Note 11), ii) refunds received in 2021 to be returned to members in 2022 iii) self-insurance reserve, iv) long-term maintenance reserve and v) future recoverable costs.

WPPI maintains assets in the Self-Insurance Fund and Renewal and Replacement Fund (see Note 2).

Revenues from members include amounts to pay bond principal and interest. For financial reporting purposes, WPPI recognizes depreciation and amortization pertaining to fixed assets and other assets financed with bond principal. As allowed through the application of GASB 62, future recoverable costs represent the difference between depreciation and amortization of assets financed with bond proceeds and the related principal recovered in rates in the present period. When the depreciation and amortization recognized exceeds the related principal amounts recovered in rates, these costs will be recovered in future periods. When the principal amounts recovered in rates exceed the related depreciation and amortization recognized, these costs will be returned in future periods.

Regulatory credit balances were as follows at December 31:

	2021	2020
CapX 2020 La Crosse & Badger-Coulee projects	\$ 6,722	\$ 65,904
Refunds received not yet returned	83,754	-
Self-insurance reserve	5,211,853	5,167,677
Long-term maintenance reserve	9,915,547	11,910,067
Future recoverable costs	20,292,939	19,166,393
	<u>\$ 35,510,815</u>	<u>\$ 36,310,041</u>

(t) *Vacation and Sick Leave*

Employees are allowed to carry over up to 80 hours of unused vacation at the end of each calendar year. In 2021 and 2020, accrued vacation was not considered material; therefore, no liability was recorded.

Under terms of employment, full time employees are granted one day of sick leave per month. Full time employees are paid annually for any sick leave accrued in excess of 960 hours at one-half their hourly rate. Accrued sick leave is not paid to employees when they leave employment.

(u) *Purchased Power*

WPPI has major purchase power agreements, as further described below, of approximately 640 MW and 616 MW at December 31, 2021 and 2020, respectively.

WEPCO Market Based Rate Tariff Agreements. WPPI makes two separate purchases from WEPCO under its market rate tariff, FERC electric tariff volume no. 8 dated October 11, 2012. WPPI pays formula-based average embedded cost rates under the first purchase with an initial term that runs through April 30, 2025. WPPI purchased 0 MW for the contract years commencing June 1, 2019, 2020 and 2021, respectively. WPPI has nominated to purchase 0 MW for the contract years commencing June 1, 2022, 2023 and 2024, respectively. WPPI may change its nomination from year to year, subject to contractual restrictions, but may not exceed 305 MW. WPPI is permitted but not obligated to schedule energy up to the nominated demand.

WPPI was obligated to purchase 50 MW under a second purchase that terminated on June 1, 2021.

WPS Long-Term Power Sale and Purchase Agreement. WPPI purchases firm partial requirements service from WPS under a long-term power sale and purchase agreement dated May 1, 2006. WPPI pays formula-based average embedded cost rates under two purchases with an initial term that runs through May 31, 2023 and May 31, 2029, respectively. WPPI purchased 150 MW for the contract years commencing June 1, 2019 and 2020, respectively, and 125 MW for the contract year commencing June 1, 2021. WPPI will purchase 100 MW, 75 MW and 50 MW for the contract years

commencing June 1, 2022, 2023 and 2024, respectively. WPPI may change its purchased amount, subject to contractual restrictions.

Point Beach Nuclear Plant. WPPI purchases approximately 167 MW (117 MW net of sales below) of unit contingent capacity and energy from the Point Beach Nuclear Plant near Two Rivers, Wisconsin under a purchase power agreement with NextEra dated May 20, 2011. The aggregate generating capacity of the Point Beach Nuclear Plant is approximately 1,185 MW. The term extends through the term of the current Nuclear Regulatory Commission operating license for each unit, which is October 5, 2030 for Unit 1 and March 8, 2033 for Unit 2.

WPPI sells 20% of its share of unit contingent capacity and energy for the life of WPPI's purchase power agreement with NextEra under a purchase power agreement with Missouri River Energy Services (MRES) dated July 13, 2011.

WPPI sells 10% of its share of unit contingent capacity and energy for the life of WPPI's purchase power agreement with NextEra under a purchase power agreement with Central Minnesota Power Agency and Services dated August 8, 2012.

Nelson Energy Center. WPPI purchases 15.6% (approximately 47 MW in each unit) of unit contingent capacity and energy from Nelson Energy Center Units 1 and 2 (Nelson Energy Center) under a purchase power agreement with Invenergy dated March 12, 2014. Nelson Energy Center is a 600 MW gas-fired combined-cycle plant located near Rock Falls, Illinois. The initial term runs through May 31, 2037.

Bishop Hill III Wind Energy Center. WPPI purchases all of the output from the Bishop Hill III Wind Energy Center in Henry County, Illinois under a purchase power agreement with Bishop Hill Energy III LLC dated July 13, 2017. Bishop Hill III Wind Energy Center has an installed capacity of 132 MW, although the maximum output will not exceed 119 MW due to transmission interconnection rights limitations. The initial term runs through May 31, 2040.

Point Beach Solar Energy Center. Effective September 13, 2021, WPPI began purchasing all the output from the Point Beach Solar Energy Center under a purchase power agreement with NextEra dated January 12, 2017. Point Beach Solar Energy Center is a 100 MW photovoltaic solar energy generating facility located in Manitowoc County, Wisconsin. The initial term runs through May 31, 2042.

Member Generation under Contract. Member generation under contract to WPPI consists of a number of small generating units, totaling approximately 39 MW and 40 MW of capacity in 2021 and 2020, respectively.

(v) ***Operating Revenues and Expenses***

Operating revenues result from exchange transactions associated with the principal activity of WPPI, the sale of electricity and the provision of other services. Reported operating revenues are affected by the contributions to or distributions from the Rate Stabilization Fund. Operating expenses are defined as expenses directly related to, or incurred in support of, the provision of electricity and other services. All other expenses are classified as non-operating expenses.

(w) Taxes

WPPI is exempt from Federal, Wisconsin, and Minnesota income taxes as a political subdivision of the State of Wisconsin. Tax expense includes Minnesota property taxes, Wisconsin payments in lieu of ad valorem taxes, payroll-related taxes and emission fees.

(x) Rates to Members

Rates to members are reviewed and adopted by WPPI's Board of Directors annually. Under WPPI's bond resolution, WPPI's rates for wholesale power sales to members are set at levels expected to yield net revenues for an annual period equal to at least 1.10 times the aggregate debt service for that period. These rates are not subject to state or federal regulation. For the years ended December 31, 2021 and 2020, WPPI's Board of Directors approved rates that were expected to yield net revenues 1.275 and 1.25 times aggregate debt service, respectively.

WPPI's Board of Directors may annually determine whether revenues that provide margin above 1.10 times debt service coverage shall be deferred and deposited to the Rate Stabilization Fund. As allowed through the application of the provisions of GASB 62, the margin may be deposited in the Rate Stabilization Fund and reported as a deferred inflow of resources on the accompanying Statements of Net Position to be distributed in future years to cover costs that otherwise would be recovered through rates to members and reported as operating revenues in the Statements of Revenues, Expenses, and Changes in Net Position. For the years ended December 31, 2021 and 2020, WPPI did not utilize the Rate Stabilization Fund nor defer any revenue.

(y) Recently Issued Accounting Pronouncements

GASB has issued Statement No. 87, *Leases*, Statement No. 91, *Conduit Debt Obligations*, Statement No. 92, *Omnibus 2020*, Statement No. 93, *Replacement of Interbank Offered Rates* and Statement No. 94, *Public-Private and Public-Public Partnerships and Availability Payment Arrangements*, Statement No. 96, *Subscription-Based Information Technology Arrangements* and Statement No. 97, *Certain Component Unit Criteria, and Accounting and Financial Reporting for Internal Revenue Code Section 457 Deferred Compensation Plans—an amendment of GASB Statements No. 14 and No. 84, and a supersession of GASB Statement No. 32*. Application of these recently issued accounting pronouncements, when effective, may restate portions of these financial statements.

(z) Comparative Data

Certain amounts presented in the prior year were reclassified to conform to the current year presentation. There was no impact on net position or change in net position as a result of the reclassifications.

(2) Cash and Investments

WPPI’s bond resolution requires the segregation of bond proceeds and maintenance of various funds, and prescribes the application of WPPI’s revenues. WPPI has an internal investment policy with guidelines to help ensure safety of principal, liquidity and diversification of its investment portfolio. Investments permitted are defined by the internal investment policy within the limits of WPPI’s bond resolution and Section 66.0825 of the Wisconsin Statutes. Funds principally consist of and/or investments generally include cash and deposits, money market mutual funds, certificates of deposit, guaranteed investment contracts, U.S. treasury securities, U.S. agency securities, commercial paper, corporate bonds, investment in the State of Wisconsin Local Government Investment Pool (LGIP) and investment in ATC. The funds’ purposes and balances were as follows at December 31:

Fund	Held by	Purpose
Construction*	WPPI	To provide for the acquisition and construction of the power supply system.
Debt Service*	Trustee	To accumulate principal and interest associated with each bond series.
Debt Service Reserve*	Trustee	To establish a reserve for the payment of principal and interest. The level of reserve is defined in the Supplemental Resolution for each bond issuance.
Revenue	WPPI	To accumulate revenues and to provide for the payment of expenses and for disposition of revenues to various funds.
Renewal & Replacement**	WPPI	To provide a reserve to be applied to the payment of the costs of renewals, replacements and repairs to the power supply system.
Self-Insurance**	WPPI	To provide a reserve to be applied to the payment of claims and losses arising from hazards and risks to the extent that the insurance required to be maintained does not cover such claims or losses.
Rate Stabilization**	WPPI	To accumulate revenues which will be used to reduce rates in a future period.
Decommissioning**	WPPI	To accumulate funds to pay for the eventual costs of decommissioning, retirement or disposal of major facilities.
General Reserve	WPPI	To be used for any lawful purpose not otherwise prohibited by WPPI's bond resolution.

*Fund balances are restricted for the purposes above.

**Fund balances have been board designated for the purposes above, but could be used for other purposes subject to approval by WPPI's Board of Directors.

	<u>2021</u>	<u>2020</u>
Current		
Unrestricted cash and investments		
Petty cash	\$ -	\$ 10
Working capital	75,514,143	74,243,790
Post retirement medical fund	579,909	603,029
Total unrestricted cash and investments	<u>76,094,052</u>	<u>74,846,829</u>
Restricted cash and investments		
Debt service funds	<u>15,632,597</u>	<u>14,961,472</u>
Total current restricted cash and investments	15,632,597	14,961,472
Total current	91,726,649	89,808,301
Non-current		
Unrestricted cash and investments		
Renewal and replacement fund	25,000,545	32,888,226
Self-insurance fund	5,203,253	5,216,191
Rate stabilization fund	46,717,152	47,780,435
Decommissioning fund	5,570,118	5,644,275
Post retirement medical fund	305,000	325,000
Total non-current unrestricted cash and investments	<u>82,796,068</u>	<u>91,854,127</u>
Restricted cash & investments		
Debt service reserve funds	25,578,692	26,704,076
Collateral accounts	1,022	1,022
Total non-current restricted cash and investments	<u>25,579,714</u>	<u>26,705,098</u>
Investment in ATC	148,260,274	144,720,029
Total non-current	<u>256,636,056</u>	<u>263,279,254</u>
Total cash and investments	<u>\$ 348,362,705</u>	<u>\$ 353,087,555</u>
Current & non-current cash and investments	\$ 200,102,431	\$ 208,367,526
Investment in ATC	<u>148,260,274</u>	<u>144,720,029</u>
Total cash and investments	<u>\$ 348,362,705</u>	<u>\$ 353,087,555</u>

WPPI's cash and investments are subject to various potential risks, including the following:

- **Custodial credit risk** – The risk that in the event of a failure of the counterparty to an investment transaction (typically a brokerage firm or financial institution), WPPI would not be able to recover the value of the investment or collateral securities.

Cash and investments in each financial institution are insured by the Federal Deposit Insurance Corporation (FDIC) in the amount of \$250,000.

WPPI held in deposit accounts \$465,376 (\$330,787 in book balances) and \$423,776 (\$260,224 in book balances) at December 31, 2021 and 2020, respectively. WPPI held \$500 in a collateral account with MISO at December 31, 2021 and 2020, respectively. WPPI also held \$522 in a collateral account with PJM at December 31, 2021 and 2020, respectively. With the exception of WPPI's investment in the LGIP, all cash and investments held as of December 31, 2021 and 2020 were held in custody on behalf of and in WPPI's name.

The FDIC insures the pro rata share of certificates of deposit held by the LGIP up to \$250,000, and the State of Wisconsin appropriation for losses on public deposits protects a depositing municipality up to \$400,000, subject to the total amount available of the State of Wisconsin Public Deposit Guarantee Fund.

The LGIP is part of the State Investment Fund (SIF), and is managed by the State of Wisconsin Investment Board. The SIF is not registered with the Securities and Exchange Commission as an investment company, but operates under the statutory authority in accordance with Chapter 25 of the Wisconsin Statutes. Participants in the LGIP have the right to withdraw their funds in total on one day's notice. WPPI held \$6,932,148 and \$7,927,795 in the LGIP which is included within WPPI's cash and investments as of December 31, 2021 and 2020, respectively.

- **Concentration risk** – Investing 5% or more of WPPI's portfolio in the securities of a single issuer. Investments issued or explicitly guaranteed by the U.S. government and investments issued and guaranteed by U.S. agencies, investments in mutual funds, external investment pools and other pooled investments are excluded. There were no investments of 5% or more in a single-issuer security, excluding such aforementioned exceptions, in WPPI's portfolio at December 31, 2021 and 2020, respectively.
- **Credit risk** – The risk that an issuer or other counterparty to an investment will not fulfill its obligations. WPPI's investments must meet the following minimum credit standards, and must be rated in the rating category indicated below (or higher) by at least two of the Nationally Recognized Statistical Rating Organizations at the time of purchase.

	Standard & Poor's	Moody's	Fitch
Minimum short-term rating	A-1	P-1	F-1
Minimum long-term rating	A-	A3	A-

WPPI's cash and investments were rated as follows at December 31:

	Standard & Poor's	Moody's	2021	2020
Money market mutual funds	AAAm	Aaa-mf	\$ 80,629,748	\$ 81,336,390
U.S. treasury/agency securities	AA+	Aaa	76,551,980	76,881,787
Municipal bonds	AAA	Aaa	473,770	752,758
Municipal bonds	AAA	N/A	1,092,056	422,268
Municipal bonds	AA+	Aaa	-	503,613
Municipal bonds	AA+	N/A	1,257,169	1,449,881
Municipal bonds	AA	Aa2	421,991	838,524
Municipal bonds	AA-	Aa2	-	246,521
Municipal bonds	AA-	Aa3	199,658	201,222
Municipal bonds	A+	Aa3	-	319,694
Municipal bonds	NR	Aa2	723,073	1,606,290
Corporate bonds	AA+	Aaa	673,426	-
Corporate bonds	AA+	Aa1	-	563,042
Corporate bonds	AA	Aa1	-	652,580
Corporate bonds	AA	Aa2	178,682	1,101,708
Corporate bonds	AA	A1	1,103,855	-
Corporate bonds	AA-	Aa1	-	100,119
Corporate bonds	AA-	Aa2	1,485,684	587,874
Corporate bonds	AA-	Aa3	2,030,228	949,087
Corporate bonds	AA-	A1	-	409,164
Corporate bonds	AA-	A2	-	472,363
Corporate bonds	A+	Aa2	261,343	-
Corporate bonds	A+	Aa3	855,647	202,332
Corporate bonds	A+	A1	2,785,444	3,209,363
Corporate bonds	A+	A2	532,668	1,193,763
Corporate bonds	A+	A3	267,848	-
Corporate bonds	A	Aa3	-	793,975
Corporate bonds	A	A1	1,863,572	1,249,441
Corporate bonds	A	A2	3,821,270	3,651,232
Corporate bonds	A	A3	-	701,939
Corporate bonds	A-	A1	429,040	879,973
Corporate bonds	A-	A2	2,999,491	3,764,787
Corporate bonds	A-	A3	2,088,645	1,982,652
Corporate bonds	A-	WR	-	40,000
Corporate bonds	BBB+	A1	950,043	-
Corporate bonds	BBB+	A2	1,055,712	1,939,468
Corporate bonds	BBB+	A3	1,095,342	1,916,235
Bank deposits, certificates of deposit, commercial paper & LGIP	n/a	n/a	14,275,046	17,447,481
			<u>\$200,102,431</u>	<u>\$208,367,526</u>

WPPI has entered into forward delivery agreements to provide a fixed rate of return for a portion of its debt service reserve funds. The provider delivers a short-term security that matures prior to WPPI's next bond payment. After the bond payment is made a new security is delivered under the forward delivery agreements. The securities delivered under the forward delivery agreements are included within WPPI's investments as of December 31, 2021 and 2020. WPPI is exposed to risk of nonperformance if the counterparties default or if the forward delivery agreements are terminated.

Forward delivery agreements held by WPPI were as follows at December 31:

	Interest Rate	Termination Date	2021	2020
Bank of America, N.A.	4.875%	7/1/2037	\$ 4,973,763	\$ 4,973,763
Bank of America, N.A.	4.980%	7/1/2037	3,119,000	3,119,000
			<u>\$ 8,092,763</u>	<u>\$ 8,092,763</u>

- **Interest rate risk** – The risk of potential variability in the fair value of fixed rate investments resulting from changes in interest rates (the longer the period for which an interest rate is fixed, the greater the risk). Investments of greater than 39 months must be authorized by WPPI's CEO and approved by WPPI's Finance and Audit and Executive Committees, respectively.

As of December 31, 2021, WPPI's cash and investments were classified by maturity as follows:

	Total	Maturity in Years		
		Less than 1	1-5	Over 5
Money market mutual funds	\$ 80,629,748	\$ 80,629,748	\$ -	\$ -
U.S. treasury/agency securities	76,551,980	10,436,478	65,513,234	602,268
Municipal bonds	4,167,717	1,369,105	2,798,612	-
Corporate bonds	24,477,940	3,914,828	20,563,112	-
Bank deposits, certificates of deposit, commercial paper & LGIP	14,275,046	13,620,657	654,389	-
	<u>\$200,102,431</u>	<u>\$109,970,816</u>	<u>\$ 89,529,347</u>	<u>\$ 602,268</u>

As of December 31, 2020, WPPI's cash and investments were classified by maturity as follows:

	Total	Maturity in Years		
		Less than 1	1-5	Over 5
Money market mutual funds	\$ 81,336,390	\$ 81,336,390	\$ -	\$ -
U.S. treasury/agency securities	76,881,787	16,526,772	59,483,670	871,345
Municipal bonds	6,340,771	870,054	5,470,717	-
Corporate bonds	26,361,097	3,687,421	22,673,676	-
Bank deposits, certificates of deposit, commercial paper & LGIP	17,447,481	13,468,103	3,979,378	-
	<u>\$208,367,526</u>	<u>\$115,888,740</u>	<u>\$ 91,607,441</u>	<u>\$ 871,345</u>

- **Fair value measurements** – WPPI categorizes its fair value measurements within the fair value hierarchy. The fair value hierarchy prioritizes the inputs to valuation techniques used to measure fair value. Level 1 inputs are quoted market prices in active markets for identical assets; Level 2 inputs are significant other observable inputs; Level 3 inputs are significant unobservable inputs. Debt securities classified in Level 1 of the fair value hierarchy were valued using prices quoted in active markets for those securities. Debt securities classified in Level 2 of the fair value hierarchy were valued using institutional bond quotes and/or evaluations based on various market and industry inputs with the exception of money market mutual funds, which were valued using one dollar per share.

As of December 31, 2021, WPPI’s recurring fair value measurements by level were as follows:

	Total	Fair Value Measurements Using		
		Level 1	Level 2	Level 3
Investments at fair value				
Debt securities				
Money market mutual funds	\$ 80,629,748	\$ -	\$ 80,629,748	\$ -
U.S. treasury securities	46,872,092	46,872,092	-	-
U.S. agency securities	29,679,888	-	29,679,888	-
Municipal bonds	4,167,717	-	4,167,717	-
Corporate bonds	24,477,940	-	24,477,940	-
Negotiable certificates of deposit	4,005,253	-	4,005,253	-
Commercial paper	2,120,926	-	2,120,926	-
Total investments at fair value	<u>\$191,953,564</u>	<u>\$ 46,872,092</u>	<u>\$145,081,472</u>	<u>\$ -</u>

As of December 31, 2020, WPPI’s recurring fair value measurements by level were as follows:

	Total	Fair Value Measurements Using		
		Level 1	Level 2	Level 3
Investments at fair value				
Debt securities				
Money market mutual funds	\$ 81,336,390	\$ -	\$ 81,336,390	\$ -
U.S. treasury securities	39,733,850	39,733,850	-	-
U.S. agency securities	37,147,937	-	37,147,937	-
Municipal bonds	6,340,771	-	6,340,771	-
Corporate bonds	26,361,097	-	26,361,097	-
Negotiable certificates of deposit	6,259,618	-	6,259,618	-
Commercial paper	2,070,783	-	2,070,783	-
Total investments at fair value	<u>\$199,250,446</u>	<u>\$ 39,733,850</u>	<u>\$159,516,596</u>	<u>\$ -</u>

(3) Investment in ATC

WPPI owns an equity interest in ATC. ATC is a for-profit, transmission only company. It owns, plans, maintains, monitors and operates electric transmission assets in portions of Wisconsin, Michigan, Illinois and Minnesota. ATC is a transmission-owning member of MISO and service over ATC's transmission system is currently provided under the MISO tariff. ATC began operations on January 1, 2001. WPPI's equity interest in ATC was approximately 6.7% at December 31, 2021 and 2020. WPPI's investment in ATC qualifies for the equity method of accounting.

Under the terms of the ownership agreement with ATC, WPPI has the right, but not the obligation, to purchase additional member units in ATC through participation in voluntary additional capital calls. At December 31, 2021, WPPI had outstanding commitments to fund ATC of \$2,340,548. The amount was paid in January, 2022.

Condensed financial information (in millions) of ATC was as follows as of and for the years ended December 31:

	2021	2020
Operating revenues	\$ 754.8	\$ 758.1
Operating expenses	(376.2)	(372.5)
Other income, net	1.1	1.9
Interest expense, net	(115.0)	(112.9)
Earnings before members' income taxes	<u>\$ 264.7</u>	<u>\$ 274.6</u>
Current assets	\$ 89.8	\$ 92.7
Net property, plant and equipment	5,618.9	5,389.6
Regulatory and other assets	9.2	11.0
Total assets	<u>\$ 5,717.9</u>	<u>\$ 5,493.3</u>
Current liabilities	\$ 436.9	\$ 310.8
Long-term debt	2,513.0	2,512.2
Regulatory and other liabilities	422.0	378.2
Members' equity	2,346.0	2,292.1
Total liabilities and capitalization	<u>\$ 5,717.9</u>	<u>\$ 5,493.3</u>

(4) Capital Assets

Capital asset activity was as follows for the years ended December 31:

2021	Beginning Balance	Additions	Retirements	Transfers	Ending Balance
Depreciable assets					
Electric plant and equipment	\$ 575,416,372	\$ 97,739	\$ (3,133,119)	\$ 6,103,984	\$ 578,484,976
Accumulated depreciation and amortization	(221,257,628)	(16,839,219)	3,100,765	-	(234,996,082)
Electric plant and equipment, net	354,158,744	(16,741,480)	(32,354)	6,103,984	343,488,894
Nondepreciable assets					
Land	1,351,215	-	-	(1,512)	1,349,703
Construction work in progress	5,962,642	9,391,584	-	(6,102,472)	9,251,754
Total capital assets	\$ 361,472,601	\$ (7,349,896)	\$ (32,354)	\$ -	\$ 354,090,351

2020	Beginning Balance	Additions	Retirements	Transfers	Ending Balance
Depreciable assets					
Electric plant and equipment	\$ 579,158,041	\$ 446,508	\$ (6,202,421)	\$ 2,014,244	\$ 575,416,372
Accumulated depreciation and amortization	(210,820,958)	(16,627,910)	6,191,240	-	(221,257,628)
Electric plant and equipment, net	368,337,083	(16,181,402)	(11,181)	2,014,244	354,158,744
Nondepreciable assets					
Land	1,346,871	290	-	4,054	1,351,215
Construction work in progress	3,762,108	4,218,832	-	(2,018,298)	5,962,642
Total capital assets	\$ 373,446,062	\$ (11,962,280)	\$ (11,181)	\$ -	\$ 361,472,601

At December 31, 2021 and 2020, the balance in construction work in progress consisted primarily of various capital projects at Boswell Unit 4.

(5) Asset Retirement Obligations

WPPI's asset retirement obligation (ARO) liability was measured based on the best estimate of the current value of outlays expected to be incurred as of December 31, 2021 and 2020, respectively. WPPI used information from Minnesota Power, WEPCO, WPL and MRES, as applicable, to estimate certain outlays expected to be incurred. See Note 1(n) for ownership information and operating agent responsibility. WPPI maintains assets in the Decommissioning Fund (see Note 2).

WPPI's AROs was comprised of the following at December 31:

2021	Description	Date of Measurement (Year)	Estimated Remaining Useful Life (Years)	ARO
Boswell Unit 4	Plant, common, coal pile, ash ponds (1)	2020	15	\$ 4,932,154
ERGS Unit 1	Plant (2)	2010	35	630,427
ERGS Unit 2	Plant (2)	2011	35	125,334
SFDL Unit 1	Diesel storage tanks (3)	2005	13	83,078
SFDL Unit 4	Diesel storage tanks (3)	2005	13	83,078
ISPP	Diesel storage tanks (3)	2019	13	141,871
Worthington Wind	Plant (2)	2020	2	326,664
Total				<u>\$ 6,322,606</u>

2020	Description	Date of Measurement (Year)	Estimated Remaining Useful Life (Years)	ARO
Boswell Unit 4	Plant, common, coal pile, ash ponds (1)	2019	16	\$ 5,430,441
ERGS Unit 1	Plant (2)	2010	36	602,127
ERGS Unit 2	Plant (2)	2011	36	119,708
SFDL Unit 1	Diesel storage tanks (3)	2005	14	79,349
SFDL Unit 4	Diesel storage tanks (3)	2005	14	79,349
ISPP	Diesel storage tanks (3)	2019	14	135,502
Worthington Wind	Plant (2)	2020	3	312,000
Total				<u>\$ 6,758,476</u>

- (1) Source of obligations; contracts (plant, common), federal laws (coal pile, ash ponds)
- (2) Source of obligations; contracts
- (3) Source of obligations; state laws

(6) Long-Term Debt

The following outstanding Power Supply System Revenue Bonds were issued to finance WPPI's acquisition and construction of electric plant and equipment:

	<u>2021</u>	<u>2020</u>
2013 Series A 4.00% to 5.00%		
Due July 1, 2020 - 2037	\$ 132,260,000	\$ 141,715,000
2014 Series A 5.00%		
Due July 1, 2025 - 2037	66,410,000	66,410,000
2016 Series A 3.00% to 5.00%		
Due July 1, 2020 - 2037	51,105,000	55,905,000
2018 Series A 5.00%		
Due July 1, 2021 - 2037	<u>40,740,000</u>	<u>41,340,000</u>
Total revenue bonds outstanding	290,515,000	305,370,000
Current maturities	(16,940,000)	(14,855,000)
Unamortized premium	<u>30,271,599</u>	<u>33,977,646</u>
Revenue bonds, net of unamortized premium	<u>\$ 303,846,599</u>	<u>\$ 324,492,646</u>

The Power Supply System Revenue Bonds contain provisions that apply in the event of default and are generally secured by all funds and revenues of WPPI derived from the ownership and operation of its power supply system. The unamortized premium is amortized over the terms of the related bond issues using a method that approximates the effective-interest method.

Debt service payments on WPPI's outstanding bonds are as follows:

Year	Principal	Interest	Total
2022	\$ 16,940,000	\$ 14,325,194	\$ 31,265,194
2023	16,325,000	13,478,194	29,803,194
2024	16,000,000	12,661,944	28,661,944
2025	16,145,000	11,861,944	28,006,944
2026	16,755,000	11,054,694	27,809,694
2027-2031	90,805,000	42,435,719	133,240,719
2032-2036	102,645,000	18,666,319	121,311,319
2037	14,900,000	699,694	15,599,694
Total	<u>\$ 290,515,000</u>	<u>\$ 125,183,702</u>	<u>\$ 415,698,702</u>

Long-term debt and non-current liability activity was as follows for the years ended December 31:

2021	Beginning Balance	Additions	Reductions	Ending Balance
Long-term debt				
Total bonds outstanding	\$ 305,370,000	\$ -	\$ (14,855,000)	\$ 290,515,000
Less: current maturities	14,855,000	16,940,000	(14,855,000)	16,940,000
Add: unamortized premium	33,977,646	-	(3,706,048)	30,271,599
Revenue bonds, net of unamortized premium	<u>\$ 324,492,646</u>	<u>\$ (16,940,000)</u>	<u>\$ (3,706,048)</u>	<u>\$ 303,846,599</u>
Non-current liabilities				
Asset retirement obligations	\$ 6,758,476	\$ 62,417	\$ (498,287)	\$ 6,322,606
Other postemployment benefits	2,500,046	372,477	(59,566)	2,812,957
Other benefits liabilities	848,536	335,620	(392,429)	791,727
Total non-current liabilities	<u>\$ 10,107,058</u>	<u>\$ 770,514</u>	<u>\$ (950,282)</u>	<u>\$ 9,927,290</u>
2020	Beginning Balance	Additions	Reductions	Ending Balance
Long-term debt				
Total bonds outstanding	\$ 324,300,000	\$ -	\$ (18,930,000)	\$ 305,370,000
Less: current maturities	18,930,000	14,855,000	(18,930,000)	14,855,000
Add: unamortized premium	37,921,533	-	(3,943,887)	33,977,646
Revenue bonds, net of unamortized premium	<u>\$ 343,291,533</u>	<u>\$ (14,855,000)</u>	<u>\$ (3,943,887)</u>	<u>\$ 324,492,646</u>
Non-current liabilities				
Asset retirement obligations	\$ 7,717,630	\$ 312,000	\$ (1,271,154)	\$ 6,758,476
Pension	2,358,846	-	(2,358,846)	-
Other postemployment benefits	1,774,816	775,106	(49,876)	2,500,046
Other benefits liabilities	743,427	293,787	(188,678)	848,536
Total non-current liabilities	<u>\$ 12,594,719</u>	<u>\$ 1,380,893</u>	<u>\$ (3,868,554)</u>	<u>\$ 10,107,058</u>

(7) Available Financing

WPPI has a credit agreement and letter of credit commitment with JPMorgan Chase Bank, N.A. (JPMorgan) through January 31, 2025. The terms permit borrowing of up to \$40,000,000 less any outstanding letters of credit issued, with interest accruing on the unpaid amount outstanding at a rate per annum equal to applicable LIBO Rate plus 115 basis points.

As of December 31, 2021, JPMorgan has issued a \$3,000,000 letter of credit on behalf of WPPI for the benefit of MISO as collateral for WPPI's participation in MISO's financial transmission rights market.

At December 31, 2021 and 2020, there was no outstanding balance on the revolving line of credit.

(8) Significant Members

On a combined basis, two significant members of WPPI accounted for \$64,288,485 and \$58,586,053, or approximately 13.6% and 14.2%, of total operating revenues for the years ended December 31, 2021 and 2020, respectively, and have long-term contracts through December 31, 2055 (see Note 1(a)).

(9) Employee Benefits

(a) Retention Plan

WPPI maintains an employee retention plan with payment obligations out until 2023. The plan will make payments to specific employees who complete defined years of continuing employment. Plan benefit expenses accrued for the years ended December 31, 2021 and 2020 were \$335,620 and \$293,787, respectively.

(b) Pension

All eligible employees participate in the Wisconsin Retirement System (WRS), a cost-sharing multiple-employer defined benefit pension plan. WRS benefits and other plan provisions are in accordance with Chapter 40 of the Wisconsin Statutes. Benefit terms may only be modified by the legislature. The WRS provides coverage to all eligible State of Wisconsin, local government and other public employees and is administered by the Wisconsin Department of Employee Trust Funds (ETF). As a municipal electric company, all eligible employees of WPPI are classified in the WRS under the general employee category. For reporting purposes, the following WRS participating terms are based on the general employee category classification only.

All employees, initially employed by a participating WRS employer on or after July 1, 2011, and expected to work at least 1,200 hours a year and expected to be employed for at least one year from employee's date of hire are eligible to participate in the WRS. Participants who initially became WRS eligible on or after July 1, 2011, must have five years of creditable service to be vested.

Employees who retire at or after age 65 are entitled to receive an unreduced retirement benefit. The factors influencing the benefit are (i) final average earnings, (ii) years of creditable service and (iii) a formula factor. Final average earnings is the average of the participant's three highest years' earnings. Creditable service is the creditable current and prior service expressed in years or decimal equivalents of partial years for which a participant receives earnings and makes contributions as required. The formula factor is a standard percentage based on employment category. Employees may retire at age 55 and receive reduced benefits. Employees terminating covered employment before becoming eligible for a retirement benefit may withdraw their contributions and forfeit all rights to any subsequent benefits. The WRS also provides death and disability benefits for employees.

The EFT's Board may periodically adjust annuity payments from the retirement system based on annual investment performance in accordance with Section 40.27 of the Wisconsin Statutes. An increase (or decrease) in annuity payments may result when investment gains (losses), together with other actuarial experience factors, create a surplus (shortfall) in the reserves, as determined by the WRS' consulting actuary. Annuity increases are not based on cost of living or other similar factors. For Core annuities, decreases may be applied only to previously granted increases. By law, Core annuities cannot be reduced to an amount below the original, guaranteed amount set at retirement. The Core and Variable annuity adjustments granted during recent years are as follows:

Year	Core Fund Adjustment	Variable Fund Adjustment
2010	-1.3%	22.0%
2011	-1.2%	11.0%
2012	-7.0%	-7.0%
2013	-9.6%	9.0%
2014	4.7%	25.0%
2015	2.9%	2.0%
2016	0.5%	-5.0%
2017	2.0%	4.0%
2018	2.4%	17.0%
2019	0.0%	-10.0%
2020	1.7%	21.0%

Required contributions are determined by an annual actuarial valuation in accordance with Chapter 40 of the Wisconsin Statutes. The employee required contribution is one-half of the actuarially determined contribution rate. Employers are required to contribute the remainder of the actuarially determined contribution rate. The employer may not pay the employee required contribution unless provided for by an existing collective bargaining agreement. For the reporting period ending December 31, 2020 and 2019, the WRS recognized \$777,084 and \$697,818, respectively, in contributions from WPPI. Contribution rates for the employee and employer were 6.75% and 6.55% as of December 31, 2020 and 2019, respectively.

At December 31, 2021, WPPI recognized an asset of \$4,166,180 for its proportionate share of the net pension asset. The net pension asset was measured as of December 31, 2020, and the total pension liability used to calculate the net pension asset was determined by an actuarial valuation as of December 31, 2019 rolled forward to December 31, 2020.

At December 31, 2020, WPPI recognized an asset of \$2,110,138 for its proportionate share of the net pension asset. The net pension asset was measured as of December 31, 2019, and the total pension liability used to calculate the net pension asset was determined by an actuarial valuation as of December 31, 2018 rolled forward to December 31, 2019.

No material changes in actuarial assumptions used to develop the total pension liability or benefit terms occurred between the respective actuarial valuation dates and the measurement dates. WPPI's proportion of the net pension liability (asset) was based on its share of contributions to the pension plan relative to the contributions of all participating employers. At December 31, 2020, WPPI's proportion was 0.06673214%, which was an increase of 0.00129045% from its proportion measured as of December 31, 2019. At December 31, 2019, WPPI's proportion was 0.06544169%, which was a decrease of 0.0009% from its proportion measured as of December 31, 2018. For the years ended December 31, 2021 and 2020, WPPI recognized pension expense of \$(722,736) and \$528,959, respectively.

A schedule of deferred outflows and inflows of resources related to pension is as follows at December 31:

2021	Deferred Outflows of Resources	Deferred Inflows of Resources
Differences between expected and actual experience	\$ 6,029,743	\$ 1,298,796
Net difference between projected and actual earnings on pension plan investments	-	7,821,664
Changes in assumptions	94,497	-
Changes in proportion and differences between employer contributions and proportionate share of contributions	26,429	258,172
Employer contributions subsequent to the measurement date	786,957	-
Total	<u>\$ 6,937,626</u>	<u>\$ 9,378,632</u>

2020	Deferred Outflows of Resources	Deferred Inflows of Resources
Differences between expected and actual experience	\$ 4,005,525	\$ 2,004,497
Net difference between projected and actual earnings on pension plan investments	-	4,313,874
Changes in assumptions	164,435	-
Changes in proportion and differences between employer contributions and proportionate share of contributions	11,749	514,281
Employer contributions subsequent to the measurement date	761,783	-
Total	<u>\$ 4,943,492</u>	<u>\$ 6,832,652</u>

During 2021 and 2020, WPPI provided additional voluntary employer contributions of \$298,389 and \$299,027, respectively, to the WRS on behalf of certain employees, which does not impact WPPI's proportionate share of the net pension liability nor its pension expense.

WPPI reported \$786,957 as deferred outflows of resources related to pension resulting from its contributions subsequent to the measurement date, which will be recognized as a reduction of the net pension liability (asset) in the year ending December 31, 2022. Other net balances reported as deferred outflows (inflows) of resources related to pension will be recognized in pension expense as follows for the years ending December 31:

2022	\$	(1,018,367)
2023		(203,165)
2024		(1,409,806)
2025		(596,625)
2026		-
Thereafter		-
Total	\$	<u>(3,227,963)</u>

The total pension liability in the respective actuarial valuation was determined using the following actuarial assumptions, applied to all periods included in the measurement:

	<u>2021</u>	<u>2020</u>
Actuarial valuation date	12/31/2019*	12/31/2018*
Measurement date	12/31/2020	12/31/2019
Actuarial cost method	Entry Age	Entry Age
Asset valuation method	Fair Value	Fair Value
Long-term expected rate of return	7.0%	7.0%
Discount rate	7.0%	7.0%
Salary increases - inflation	3.0%	3.0%
Salary increases - seniority/merit	0.1% - 5.6%	0.1% - 5.6%
Mortality	Wisconsin 2018 Mortality Table	Wisconsin 2018 Mortality Table
Post-retirement adjustments**	1.9%	1.9%

*Actuarial assumptions are based upon an experience study conducted in 2018 using experience from 2015 through 2017.

**No post-retirement adjustment is guaranteed. Actual adjustments are based on recognized investment return, actuarial experience and other factors. The assumed annual adjustment is based on the investment return assumption and post-retirement discount rate.

The long-term expected rate of return on pension plan investments was determined using a building-block method in which best-estimate ranges of expected future real rates of return (expected returns, net of pension plan investment expense and inflation) are developed for each major asset class. These ranges are combined to produce the long-term expected rate of return by weighting the expected future real rates of return by the target asset allocation percentage and by adding expected inflation.

The target allocation and best estimates of geometric real rates of return for each major asset class are summarized as follows as of December 31:

	2021			2020		
	Asset Allocation %	Long-Term Expected Nominal Rate of Return %	Long-Term Expected Real Rate of Return %	Asset Allocation %	Long-Term Expected Nominal Rate of Return %	Long-Term Expected Real Rate of Return %
<u>Core Fund Asset Class</u>						
Global equities	51.0%	7.2%	4.7%	49.0%	8.0%	5.1%
Fixed income	25.0%	3.2%	0.8%	24.5%	4.9%	2.1%
Inflation sensitive assets	16.0%	2.0%	-0.4%	15.5%	4.0%	1.2%
Real estate	8.0%	5.6%	3.1%	9.0%	6.3%	3.5%
Private equity/debt	11.0%	10.2%	7.6%	8.0%	10.6%	7.6%
Multi-asset	4.0%	5.8%	3.3%	4.0%	6.9%	4.0%
Total core fund	115.0%	6.6%	4.1%	110.0%	7.5%	4.6%
<u>Variable Fund Asset Class</u>						
U.S. equities	70.0%	6.6%	4.1%	70.0%	7.5%	4.6%
International equities	30.0%	7.4%	4.9%	30.0%	8.2%	5.3%
Total variable fund	100.0%	7.1%	4.6%	100.0%	7.8%	4.9%

New England Pension Consultants Long-Term U.S. CPI (Inflation) Forecast:

2.40% (2021) and 2.75% (2020)

Asset allocations are managed within established ranges; target percentages may differ from actual monthly allocations.

A single discount rate of 7.00% was used to measure the total pension liability for the current and prior year. This single discount rate was based on the expected rate of return on pension plan investments of 7.00% and a municipal bond rate of 2.00% compared to 7.00% and 2.75%, respectively, from the prior year. Because of the unique structure of the WRS, the expected rates of return imply that the dividend will always be paid. For purposes of the single discount rate, it was assumed that the dividend would always be paid. The projection of cash flows used to determine this single discount rate assumed that plan member contributions will be made at the current contribution rate and that employer contributions will be made at rates equal to the difference between actuarially determined contribution rates and the member rate. Based on these assumptions, the pension plan's fiduciary net position was projected to be available to make all projected future benefit payments (including expected dividends) of current plan members. Therefore, the long-term expected of return on pension plan investments was applied to all periods of projected benefit payments to determine the total pension liability (asset) for the years presented.

The following presents WPPI’s proportionate share of the net pension liability (asset) calculated using the current discount rate, as well as what the its proportionate share of the net pension liability (asset) would be if it were calculated using discount rates that are one percentage point lower and one percentage point higher than the current discount rate was as follows at December 31:

	2021	2020
One percentage point lower (6.00%)	\$ 3,965,626	\$ 5,433,984
Current discount rate (7.00%)	(4,166,180)	(2,110,138)
One percentage point higher (8.00%)	(10,138,931)	(7,750,238)

Detailed information about the pension plan’s fiduciary net position is available in separately issued financial statements at <https://etf.wi.gov/files/acfr-2020/download?inline=>.

WPPI had a payable of \$189,033 for the outstanding amount of contributions to the pension plan required for the year ended December 31, 2021. The amount was paid in January, 2022.

(c) Other Postemployment Benefits (OPEB)

The WPPI Post-Employment Benefit Plan (Plan) is a single-employer defined benefit plan that provides limited postemployment health benefits for eligible employees. An employee who reaches age 60 and has ten years of service with WPPI qualifies for retiree benefits. For each full year worked past ten, the employee receives one year of benefit credit. An employee can earn up to a maximum of five years of benefit credits. For each year of benefit credit, WPPI will reimburse the employee for a portion of the cost of health insurance. Full-time employees qualify for 50% reimbursement and part-time employees will receive a pro rata portion. Upon eligibility for Medicare, full-time employees may be reimbursed up to 100% and part-time employees a pro rata portion of the cost of a Medicare supplemental policy, subject to certain caps. Separate arrangements provide health insurance premium payments for life for one retired participant and one retired participant and spouse. WPPI administers the Plan and does not charge for services. WPPI’s Executive Committee approves amendments to the Plan. At December 31, 2021, there were 114 eligible active participants, 1 ineligible active participant, 1 eligible inactive participant and 5 retirees and surviving spouses. At December 31, 2020, there were 110 eligible active participants and 5 retirees and surviving spouses.

WPPI’s Board of Directors did not designate earnings to be held for the purpose of funding future OPEB obligations in 2021 or 2020. Since inception, \$1,365,000 has been designated for the purpose of funding future OPEB obligations. For these designations to be recognized toward funding future OPEB obligations under GASB 75, *Accounting and Financial Reporting for Postemployment Benefit Plans Other Than Pensions* (GASB 75), they would need to be administered through a qualifying trust. WPPI holds the dollars in a segregated account, but the dollars remain under WPPI’s control. There are no standalone financial statements for the Plan. Additional schedules are presented in the Required Supplementary Information section.

Components of and changes in WPPI's total OPEB liability were as follows at December 31:

	<u>2021</u>	<u>2020</u>
Balance, beginning of year	\$ 2,500,046	\$ 1,774,816
Service cost	159,246	108,641
Interest on total OPEB liability	69,758	73,069
Economic/demographic (gains) or losses	-	45,515
Assumption changes or inputs	143,473	547,881
Benefit payments	<u>(59,566)</u>	<u>(49,876)</u>
Balance, end of year	<u>\$ 2,812,957</u>	<u>\$ 2,500,046</u>

The total OPEB liability was determined by an actuarial valuation as of the measurement date, calculated based on the discount rate and actuarial assumptions, and where consistent with the terms of the Plan, utilized assumptions provided in the WRS actuarial valuation reports at December 31, 2019. Key actuarial assumptions were as follows at December 31:

	<u>2021</u>	<u>2020</u>
Actuarial valuation date	12/31/2020	12/31/2020
Measurement date	12/31/2020	12/31/2019
Actuarial cost method	Entry Age	Entry Age
Discount rate	2.12%	2.74%
Salary increases - inflation	3.0%	3.0%
Mortality	Wisconsin 2018 Mortality Table	Wisconsin 2018 Mortality Table

Healthcare cost trend rates, based on the Getzen Model of Long-Run Medical Cost Trends published by the Society of Actuaries, begin in 2021 and transition to an ultimate in 2074 and were as follows:

	<u>Pre 65</u>	<u>Post 65</u>	<u>Part B Premium</u>
Initial	6.00%	5.80%	6.20%
Ultimate	3.70%	3.70%	3.70%

Under GASB 75, employers not accumulating assets through a qualifying trust are required to select a discount rate based on a yield or index rate for 20-year, tax-exempt general obligation municipal bonds with an average rating of AA/Aa or higher. The discount rate selected by WPPI was based on the 20-year Bond Buyer GO Index rate published closest to, but not later than, the measurement date.

The total OPEB liability, calculated using the current discount rate, as well as what the total OPEB liability would be if it were calculated using discount rates that are one percentage point lower and one percentage point higher than the current discount rate was as follows at December 31:

	<u>2021</u>	<u>2020</u>
One percentage point lower (1.12%, 1.74%)	\$ 3,060,816	\$ 2,726,403
Current discount rate (2.12%, 2.74%)	2,812,957	2,500,046
One percentage point higher (3.12%, 3.74%)	2,585,290	2,293,189

The total OPEB liability, calculated using the annual medical trend rates above as well as what the total OPEB liability would be if it were calculated using annual medical trend rates that are one percentage point lower and one percentage point higher than the current annual medical trend rates was as follows at December 31:

	2021	2020
One percentage point lower	\$ 2,486,245	\$ 2,230,123
Current annual medical trend rates	2,812,957	2,500,046
One percentage point higher	3,202,479	2,819,034

For the years ended December 31, 2021 and 2020, WPPI recognized OPEB expense of \$285,343 and \$226,270, respectively. Components of OPEB expense and deferred outflows and inflows of resources related to OPEB were as follows at December 31:

2021	Original Amount	Date Established	Recognized in OPEB Expense	Balance of Deferred Outflows of Resources	Balance of Deferred Inflows of Resources
Service cost (1)	\$ 159,246	12/31/2021	\$ 159,246	\$ -	\$ -
Interest on total OPEB liability (1)	69,758	12/31/2021	69,758	-	-
Economic/demographic (gains) or losses (2)	45,515	12/31/2020	3,737	38,041	-
Assumption changes/other inputs(2)	143,473	12/31/2021	11,779	131,694	-
Assumption changes/other inputs(2)	547,881	12/31/2020	44,982	457,917	-
Assumption changes/other inputs(2)	(103,327)	12/31/2019	(8,286)	-	78,469
Assumption changes/other inputs(2)	51,460	12/31/2018	4,127	34,952	-
Contributions made subsequent to measurement date	46,166	12/31/2021	-	46,166	-
Total	\$ 960,172		\$ 285,343	\$ 708,770	\$ 78,469

2020	Original Amount	Date Established	Recognized in OPEB Expense	Balance of Deferred Outflows of Resources	Balance of Deferred Inflows of Resources
Service cost (1)	\$ 108,641	12/31/2020	\$ 108,641	\$ -	\$ -
Interest on total OPEB liability (1)	73,069	12/31/2020	73,069	-	-
Economic/demographic (gains) or losses (2)	45,515	12/31/2020	3,737	41,778	-
Assumption changes/other inputs(2)	547,881	12/31/2020	44,982	502,899	-
Assumption changes/other inputs(2)	(103,327)	12/31/2019	(8,286)	-	86,755
Assumption changes/other inputs(2)	51,460	12/31/2018	4,127	39,079	-
Contributions made subsequent to measurement date	59,566	12/31/2020	-	59,566	-
Total	\$ 782,805		\$ 226,270	\$ 643,322	\$ 86,755

- (1) WPPI recognized in OPEB expense, the original amount associated with these components in the year presented (the period of the change).
- (2) WPPI recognized in OPEB expense over a closed period equal to the average of the expected remaining service lives of active and inactive participants that are provided benefits through the Plan, beginning with the year ended that corresponds to the date established.

WPPI reported \$46,166 as deferred outflows of resources related to OPEB resulting from its contributions subsequent to the measurement date, which will be recognized as a reduction of the total OPEB liability in the year ending December 31, 2022. Other net balances reported as deferred outflows (inflows) of resources related to OPEB will be recognized in OPEB expense as follows for the years ending December 31:

2022	\$	56,339
2023		56,339
2024		56,339
2025		56,339
2026		56,339
Thereafter		<u>302,440</u>
Total	\$	<u><u>584,135</u></u>

(10) Risk Management

WPPI is exposed to various risks of loss related to torts; theft of, damage to, or destruction of assets; errors and omissions; workers' compensation; and health care of its employees. The generating units are covered by insurance, including property and boiler and machinery policies. WPPI is responsible for deductibles under the policies. Other risks are covered through the purchase of commercial insurance, with minimal deductibles. For 2021 and 2020, there were no settlements exceeding coverage.

(11) Commitments and Contingencies

WPPI follows GASB 62, which addresses financial accounting and disclosure requirements for loss and gain contingencies. A liability associated with a loss contingency is recognized only if the available information indicates that it is probable and can be reasonably estimated. Gain contingencies are not recognized until realized.

WPPI has a mix of purchase power agreements of varying durations with a number of suppliers used to meet a portion of the electric power requirements of its members. In addition to the major purchase power agreements described in Note 1(u), WPPI has purchase power agreements from other wind, run of river hydro, landfill gas and solar resources with name plate capacity totaling approximately 169 MW at December 31, 2021 and 2020, respectively.

WPPI participates in the MISO market. MISO routinely true-up revenues and expenses for up to 105 days. Under special circumstances, MISO has trued-up revenues and expenses for longer durations. WPPI accrues items that are known at the time of closing, but since there is such a large window of true-ups, actual results may differ from the estimates.

A group of organizations filed two complaints with FERC seeking, among other things, to lower the MISO-wide base return on equity (ROE) of 12.38%. The first complaint was filed on November 12, 2013 and covered the period through February 11, 2015. The second complaint was filed on February 12, 2015 and covered the period through May 11, 2016.

On September 28, 2016, FERC issued Opinion No. 551 that established the MISO-wide base ROE of 10.32%. Opinion No. 551 further ordered MISO and its transmission owners, including ATC, to refund, with interest, the difference between the revenues collected and the lower amount authorized from November 12, 2013 through February 11, 2015, the period of the first complaint. Following subsequent extensions, refunds were completed by June 16, 2017.

On November 21, 2019, FERC issued Opinion No. 569 that adopted a new methodology for determining whether a jurisdictional public utility's ROE is just and reasonable under section 206 of the Federal Power Act. Applying the new methodology in the two previously filed complaints, FERC determined the MISO-wide base ROE of 12.38% to be unjust and unreasonable and revised the new MISO-wide base ROE from 10.32% to 9.88%. Opinion No. 569 further ordered MISO and its transmission owners, including ATC, to refund, with interest, the difference between the revenues collected and the lower authorized amount for the period of the first complaint and for the period from September 28, 2016 through November 21, 2019. This order also dismissed the second complaint for the period of February 12, 2015 through May 11, 2016.

On December 18, 2019, FERC granted the request by MISO and its transmission owners, including ATC, for an extension of time until December 23, 2020 to make the refunds ordered by Opinion No. 569. On January 21, 2020, FERC issued an order granting rehearing for further consideration.

On May 21, 2020, FERC issued Opinion No. 569-A that revised the new methodology established by Opinion No. 569, and upon application, further revised the MISO-wide base ROE from 9.88% to 10.02%. Opinion No. 569-A further ordered MISO and its transmission owners, including ATC, to provide refunds, with interest, by December 23, 2020 based on the revised MISO-wide ROE of 10.02% for the period related to the first complaint and for the period from September 28, 2016 through May 21, 2020. This order also denied rehearing on its dismissal of the second complaint.

On October 8, 2020, FERC granted the request by MISO and its transmission owners, including ATC, for an extension of time until September 23, 2021 to make the refunds, including interest, ordered by Opinion No. 569-A.

On November 19, 2020, FERC issued Opinion No. 569-B that reaffirmed the revised methodology and the MISO-wide base ROE of 10.02% adopted in Opinion No. 569-A. Opinion No. 569-B further ordered MISO and its transmission owners, including ATC, to provide refunds, with interest, by September 23, 2021 based on the MISO-wide ROE of 10.02% for the period related to the first complaint and for the period from September 28, 2016 through November 19, 2020.

On August 2, 2021, FERC partially granted the request by MISO and its transmission owners, including ATC, for an extension of time until February 28, 2022 to make the refunds, including interest, ordered by Opinion Nos. 569-A and 569-B. On December 16, 2021, MISO and its transmission owners, including ATC, requested an extension to May 31, 2022 to complete remaining refunds. The request is still outstanding.

Due to the nature, timing and complexity of the refund periods, subsequent resettlements, and prospective implementations, MISO and its transmission owners, including ATC, have refunded and resettled some but not all dollars ordered under these FERC proceedings. As a result, WPPI received refunds, including interest, for certain transmission service charges previously paid totaling \$1.8 million and \$5.0 million during 2020 and 2017, respectively. As of December 31, 2020, WPPI recorded a regulatory asset of \$1.3 million to reflect the difference between the amount refunds returned to members through rates in 2020 and the amount WPPI ultimately received in refunds in 2020 (see Note 1(I)). WPPI received refunds, including interest, for certain transmission service charges previously paid totaling \$1.4 million during 2021. As a result, the \$1.3 million previously recorded as a regulatory asset was extinguished, with the

remaining net refund received but not yet returned to members totaling \$83,754 at December 31, 2021 (see Note 1(s)).

Petitions have been filed with the U.S. Court of Appeals for the D.C. Circuit, and review of certain FERC ROE proceedings is currently underway. On April 15, 2021, FERC issued a supplemental Notice of Proposed Rulemaking (NOPR) that would, among other things, require utilities receiving the 50 basis point ROE adder to eliminate it after three years. The NOPR is still outstanding. The rate of return WPPI would receive for its share of the CapX 2020 La Crosse project and the Badger-Coulee project, and its investment in ATC, would decrease as a result of a lower or elimination of the 50 basis point ROE adder. WPPI's overall transmission costs to serve its members would also reflect the lower rate of return. WPPI is unable to predict the outcome of any legal challenges or FERC proceedings.

On July 8, 2019, the U.S. Environmental Protection Agency (EPA) published the final Affordable Clean Energy (ACE) rule, which repealed the Clean Power Plan, effective September 6, 2019. The final rule establishes emissions guidelines for states to use when developing plans to limit greenhouse gas emissions at existing coal-fired power plants under the Clean Air Act, and is subject to legal challenges. On January 19, 2021, the U.S. Court of Appeals for the D.C. Circuit vacated the ACE rule and remanded it back to the U.S. EPA. In October 2021, the U.S. Supreme Court agreed to review the D.C. Circuit's ruling vacating the EPA's ACE rule. WPPI is unable to predict the outcome of any legal challenges or the potential impact on the final form and timing of these regulations.

WPPI's electric utility operations are subject to continuing environmental regulation and federal, state, regional and local standards and procedures that regulate the environmental impact of WPPI's system, and the systems of utilities from which WPPI purchases power, and are subject to change. Any such changes may arise from legislative, regulatory or judicial actions.

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REQUIRED SUPPLEMENTARY INFORMATION

WPPI Energy
Schedule of Employer's Proportionate Share of the Net Pension Liability (Asset)
Wisconsin Retirement System

Fiscal Year End	Proportion of the Net Pension Liability (Asset)	Proportionate Share of the Net Pension Liability (Asset)	Covered Payroll	Proportionate Share of the Net Pension Liability (Asset) as a Percentage of Covered Payroll	Plan Fiduciary Net Position as a Percentage of the Total Pension Liability (Asset)
12/31/21	0.06673214%	\$ (4,166,180)	\$ 11,512,360	-36.19%	105.26%
12/31/20	0.06544169%	(2,110,138)	10,653,423	-19.81%	102.96%
12/31/19	0.06630282%	2,358,846	9,915,877	23.79%	96.45%
12/31/18	0.06747679%	(2,003,465)	9,691,520	-20.67%	102.93%

Note: Schedule is intended to show information for 10 years.
Additional years will be displayed as they become available.

WPPI Energy
Schedule of Employer Contributions
Wisconsin Retirement System

Fiscal Year End	Contractually Required Contributions	Contributions in Relation to the Contractually Required Contributions	Contribution Deficiency (Excess)	Covered Payroll	Contributions as a Percentage of Covered Payroll
12/31/21	\$ 786,957	\$ 786,957	\$ -	\$ 11,658,622	6.75%
12/31/20	777,084	777,084	-	11,512,360	6.75%
12/31/19	697,818	697,818	-	10,653,423	6.55%
12/31/18	664,364	664,364	-	9,915,877	6.70%
12/31/17	659,021	659,021	-	9,691,520	6.80%

Note: Schedule is intended to show information for 10 years.
 Additional years will be displayed as they become available.

WPPI Energy
Schedule of Changes in the Employer's Total OPEB Liability and Related Ratios
Year Ended December 31

	2021	2020	2019	2018
Balance, beginning of year	\$ 2,500,046	\$ 1,774,816	\$ 1,764,760	\$ 1,545,914
Service cost	159,246	108,641	116,626	106,135
Interest on total OPEB liability	69,758	73,069	61,328	61,251
Economic/demographic (gains) or losses	-	45,515	-	-
Assumption changes or inputs	143,473	547,881	(103,327)	51,460
Benefit payments	(59,566)	(49,876)	(64,571)	-
Balance, end of year	<u>\$ 2,812,957</u>	<u>\$ 2,500,046</u>	<u>\$ 1,774,816</u>	<u>\$ 1,764,760</u>
Covered payroll	\$ 11,871,000	\$ 11,507,516	\$ 10,982,675	\$ 10,161,638
Total OPEB liability as percentage of covered payroll	23.70%	21.73%	16.16%	17.37%
Actuarial valuation date	12/31/2020	12/31/2020	12/31/2018	12/31/2018
Measurement date	12/31/2020	12/31/2019	12/31/2018	12/31/2017
Actuarial cost method	Entry Age	Entry Age	Entry Age	Entry Age
Discount rate	2.12%	2.74%	4.10%	3.44%
Salary increases - inflation	3.0%	3.0%	3.2%	3.2%
Mortality	WI 2018	WI 2018	WI 2012	WI 2012
Pre 65 - initial, ultimate	6.0%, 3.7%	6.0%, 3.7%	8.2%, 3.9%	8.2%, 3.9%
Post 65 - initial, ultimate	5.8%, 3.7%	5.8%, 3.7%	5.7%, 3.8%	5.7%, 3.8%
Part B premium - initial, ultimate	6.2%, 3.7%	6.2%, 3.7%	1.1%, 3.9%	1.1%, 3.9%

Note: Schedule is intended to show information for 10 years.

Additional years will be displayed as they become available.

Schedule uses the optional format of combining the required schedules.

Assets are not accumulated in a qualifying trust to pay related benefits.

WPPI Energy
Notes to Required Supplementary Information
Wisconsin Retirement System

Changes in benefit terms. There were no changes in benefit terms for any participating employer in the Wisconsin Retirement System.

Changes in assumptions.

Fiscal Year End	Long-Term Expected Rate of Return	Discount Rate	Salary Increases (Inflation, Seniority/Merit)	Mortality Table	Post- Retirement Adjustments
12/31/21	7.0%	7.0%	3.0%, 0.1% - 5.6%	Wisconsin 2018	1.9%
12/31/20	7.0%	7.0%	3.0%, 0.1% - 5.6%	Wisconsin 2018	1.9%
12/31/19	7.0%	7.0%	3.0%, 0.1% - 5.6%	Wisconsin 2018	1.9%
12/31/18	7.2%	7.2%	3.2%, 0.2% - 5.6%	Wisconsin 2012	2.1%

Note: Schedule is intended to show information for 10 years.
 Additional years will be displayed as they become available.