

WEC Energy Group Inc. 2022 & 2023 CDP Climate Data Verification Statement

INTRODUCTION

Trinity Consultants, Inc. ("Trinity") was contracted by WEC Energy Group, Inc. ("WEC") to verify its greenhouse gas ("GHG") emissions inventories for its operations for the 2022 and 2023 calendar years. WEC is reporting 2022 and 2023 GHG emissions as part of its response to the 2024 Carbon Disclosure Project ("CDP") Investor Questionnaire. According to CDP provisions, WEC has the option to have this annual report independently verified by an accredited Verification Body ("VB"). The GHG inventory compiled by WEC and the GHG inventory verification performed by Trinity is a component of WEC's long-term GHG management strategy.

WEC is solely responsible for the preparation of the data collection, analysis, compilation, and external reports. Trinity's verification and assurance engagement are based on the assumption that WEC's data and information are sufficient, accurate, and complete. Trinity's responsibility in performing the verification and assurance work is to the management of WEC only and is solely for WEC's benefit in accordance with the terms of the contract. Our verification statement, however, represents Trinity's independent opinion and is intended to inform all stakeholders, including WEC. Trinity disclaims any liability or responsibility for Trinity's work to CDP or to any other party who may have access to this statement or the verification report.

SCOPE OF VERIFICATION AND ASSURANCE

The scope of work agreed with WEC includes the following:

- ▶ Organizational boundaries for the GHG inventory are all sites operating under WEC's operational control;
- ▶ Verification was carried out to a **limited level** of assurance;
- ▶ Verification was conducted using the ISO 14064-3:2019 Standard;
- ▶ The reporting of the GHG emissions was conducted using World Business Council for Sustainable Development ("WBCSD") / World Resources Institute ("WRI") Greenhouse Gas Protocol;
- ▶ GHG emission quantities were verified for calendar years 2022-2023 from January 1, 2022, to December 31, 2023;
- ▶ Emissions data verified includes Scope 1 and Scope 2; and
- ▶ Verification activities were conducted in July through October of 2024.

VERIFICATION METHODOLOGY

The objective of verification and assurance engagement by Trinity was to provide an independent and objective review of the emissions data reports for WEC's enterprise-wide emissions for Scope 1 and 2 for the calendar years 2022 and 2023. The emissions data reports are reviewed against the criteria and standards stated below:

- ▶ WRI / WBCSD Greenhouse Gas Protocol - A Corporate Accounting and Reporting Standard.
- ▶ ISO 14064-3:2019 – Greenhouse Gases Part 3: Specification with Guidance for the Validation and Verification of Greenhouse Gas assertions.
- ▶ WEC's Greenhouse Gas Data Quality Management Plan and Emission Calculation Protocol ("QMP")

HEADQUARTERS

Trinity applied a risk-based approach throughout the assurance engagement, concentrating on the areas that Trinity believes are at risk of materiality.

The following tasks and methodologies were applied during the verification of WEC's GHG data, inventory, supporting documents, and management processes:

- ▶ Identify and review conformance with the assurance level declared in the CDP questionnaire response and the accuracy requirements using ISO 14064-3:2019 verification standards as appropriate;
- ▶ Review and verify emission estimates with the applicable GHG emission calculations/reporting protocols and principles such as WRI/WBCSD Greenhouse Gas Protocol;
- ▶ Review and verify GHG facility data for completeness and accuracy;
- ▶ Review a selection of data provided from a sampling of WEC facilities which is consistent with the selected level of assurance;
- ▶ Interviewed key staff from WEC's corporate headquarters in Milwaukee, WI responsible for WEC's environmental programs for the specified GHG data;
- ▶ Review WEC's data management systems for emission data, transactions, bookkeeping records, reports, and compliance documents;
- ▶ Evaluate and check materiality of any misstatement in actual data;
- ▶ Review, identify, and list all deficiencies and conformance gaps; and
- ▶ Provide WEC with an official verification statement with a verification summary that includes the findings of the verification process and any improvements and corrective actions taken.

CONCLUSIONS

WEC's GHG assertions by Scope 1 and Scope 2 categories are as follows:

▶ 2022

- Scope 1 emissions of **18,980,453** metric tonnes (MT) CO₂e
 - ◆ Electricity Generation 18,465,595 MT
 - ◆ Company Gas Usage 66,398 MT
 - ◆ Fleet Vehicles 33,706 MT
 - ◆ Natural Gas Storage/Distribution 414,754 MT
- Scope 2 emissions
 - ◆ Purchased Electricity and Gas 11,348 MT
 - ◆ Market-Based Totals 210,751 MT
 - ◆ Location-Based Totals 251,196 MT

▶ 2023

- Scope 1 emissions of **19,447,677** metric tonnes CO₂e
 - ◆ Electricity Generation 18,962,656 MT
 - ◆ Company Gas Usage 60,504 MT
 - ◆ Fleet Vehicles 30,730 MT
 - ◆ Natural Gas Storage/Distribution 393,787 MT
- Scope 2 emissions
 - ◆ Purchased Electricity and Gas 9,327 MT
 - ◆ Market-Based Totals 186,308 MT
 - ◆ Location-Based Totals 210,546 MT

Based on verification activities performed, Trinity attests with a **limited assurance** that no discrepancies were identified that would indicate that the activity data, emissions calculations, and equations supporting the company's GHG emission quantities reported to CDP are not represented fairly in accordance with WRI/WBCSD GHG Protocols.

LIMITATIONS

Trinity's work did not include visits or physical inspections of any of WEC's operating facilities. Trinity's approach to this verification was not intended to detect all weaknesses in management controls. The verification was performed on corporate management controls on a sample basis, as noted previously. Further, it should be noted that the reliability of environmental data may be subject to inherent uncertainties, based on the established methods used to measure or calculate the underlying information.

INDEPENDENCE

Trinity is an independent professional services firm that specializes in environmental, health and safety, and sustainability compliance, risk, and performance management. Trinity is ISO 9001:2015 certified at its corporate office in Dallas, Texas. Trinity's Quality Management System, based on the ISO standard, is implemented throughout its consulting operations, including verification services companywide. Trinity was not involved in the preparation of any part of WEC's data or reports.

TRINITY CONSULTANTS



Charles C. Lee, Ph.D.
Principal Consultant | Manager of Consulting Services – Irvine
California Air Resources Board Accredited Lead Verifier

October 21, 2024