



MGE Energy Inc.

# 2025 CDP Corporate Questionnaire 2025

Word version

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## C1. Introduction

### (1.1) In which language are you submitting your response?

Select from:

☒ English

### (1.2) Select the currency used for all financial information disclosed throughout your response.

Select from:

☒ USD

### (1.3) Provide an overview and introduction to your organization.

#### (1.3.2) Organization type

Select from:

☒ Publicly traded organization

#### (1.3.3) Description of organization

*Madison Gas and Electric (MGE) generates and distributes electricity to 167,000 customers in Dane County and purchases and distributes natural gas to 178,000 customers in seven south-central and western Wisconsin counties. MGE is a subsidiary of MGE Energy (Nasdaq: MGE), an investor-owned public utility holding company based in Madison, Wis. MGE's roots in the Madison area date back more than 150 years. Assets total more than \$2.8 billion. In 2024, revenue was approximately \$677 million. MGE continues to undergo a clean energy transition, with forecasted capital investment of nearly \$850 million in generation from 2025 through 2029 to support MGE's carbon reduction goals. The company has more than a dozen solar, wind, battery and energy storage projects in various stages of development and continues to evaluate additional cost-effective opportunities to decarbonize its electric generation. These investments, combined with MGE's ongoing transition from coal, will help the company achieve its carbon reduction goals. MGE is targeting net-zero carbon electricity by 2050. Known as your community energy company, MGE is pursuing globally recognized decarbonization strategies to achieve net-zero carbon electricity, working together with customers to grow clean energy generation, advance the electrification of transportation and engage around energy efficiency. Working together, we can achieve a more sustainable energy future. MGE also has a goal to achieve net-zero methane emissions from its natural gas distribution system by 2035. In 2024, MGE introduced a program for its natural gas customers who are interested in renewable natural gas (RNG). MGE's Green Power Tomorrow (GPT) RNG program is an opportunity for residential and business customers to offset their greenhouse gas emissions from their use of natural gas. It is an expansion of MGE's GPT program for residential and business electric customers of MGE. We intend to meet our sustainability goals while maintaining our fundamental commitments to safe, reliable, affordable*

energy and to community-focused customer service. This report contains forward-looking statements that reflect management's current assumptions and estimates regarding future performance and economic conditions— especially as they relate to economic conditions, future load growth, revenues, expenses, capital expenditures, financial resources, regulatory matters, and the scope and expense associated with future environmental regulation. These forward-looking statements are made pursuant to the provisions of the Private Securities Litigation Reform Act of 1995. Words such as "believe," "expect," "anticipate," "estimate," "could," "should," "intend," "will," and other similar words, and words relating to goals, targets, and projections, generally identify forward-looking statements. These forward-looking statements are subject to known and unknown risks and uncertainties that may cause actual results to differ materially from those projected, expressed, or implied. MGE Energy and MGE undertake no obligation to release publicly any revision to these forward-looking statements to reflect events or circumstances after the date of this report.

**(1.4) State the end date of the year for which you are reporting data. For emissions data, indicate whether you will be providing emissions data for past reporting years.**

	End date of reporting year	Alignment of this reporting period with your financial reporting period	Indicate if you are providing emissions data for past reporting years
	12/30/2024	Select from: <input checked="" type="checkbox"/> Yes	Select from: <input checked="" type="checkbox"/> No

**(1.4.1) What is your organization’s annual revenue for the reporting period?**

676944

**(1.5) Provide details on your reporting boundary.**

	Is your reporting boundary for your CDP disclosure the same as that used in your financial statements?
	Select from: <input checked="" type="checkbox"/> Yes

**(1.6) Does your organization have an ISIN code or another unique identifier (e.g., Ticker, CUSIP, etc.)?**

	Does your organization use this unique identifier?	Provide your unique identifier
Ticker symbol	Select from: <input checked="" type="checkbox"/> Yes	MGEE

**(1.7) Select the countries/areas in which you operate.**

Select all that apply

☒ United States of America

**(1.16) In which part of the electric utilities value chain does your organization operate?**

Electric utilities value chain

☒ Distribution

☒ Electricity generation

Other divisions

☒ Gas storage, transmission and distribution

☒ Smart grids/demand response

**(1.16.1) For your electricity generation activities, provide details of your nameplate capacity and electricity generation specifics for each technology employed.**

## **Coal - Hard**

### **(1.16.1.1) Own or control operations which use this power generation source**

*Select from:*

☒ Yes

### **(1.16.1.2) Nameplate capacity (MW)**

317

### **(1.16.1.4) Net electricity generation (GWh)**

1452.2

## **Lignite**

### **(1.16.1.1) Own or control operations which use this power generation source**

*Select from:*

☒ No

## Oil

### (1.16.1.1) Own or control operations which use this power generation source

Select from:

☒ Yes

### (1.16.1.2) Nameplate capacity (MW)

60

### (1.16.1.4) Net electricity generation (GWh)

0.5

## Gas

### (1.16.1.1) Own or control operations which use this power generation source

Select from:

☒ Yes

### (1.16.1.2) Nameplate capacity (MW)

504

### (1.16.1.4) Net electricity generation (GWh)

654.4

## Sustainable biomass

(1.16.1.1) Own or control operations which use this power generation source

Select from:

☒ No

## Other biomass

(1.16.1.1) Own or control operations which use this power generation source

Select from:

☒ No

## Waste (non-biomass)

(1.16.1.1) Own or control operations which use this power generation source

Select from:

☒ No

## Nuclear

(1.16.1.1) Own or control operations which use this power generation source

Select from:

☒ No

## Fossil-fuel plants fitted with carbon capture and storage

(1.16.1.1) Own or control operations which use this power generation source

Select from:

☒ No

## Geothermal

### (1.16.1.1) Own or control operations which use this power generation source

Select from:

☒ No

## Hydropower

### (1.16.1.1) Own or control operations which use this power generation source

Select from:

☒ No

## Wind

### (1.16.1.1) Own or control operations which use this power generation source

Select from:

☒ Yes

### (1.16.1.2) Nameplate capacity (MW)

134

### (1.16.1.4) Net electricity generation (GWh)

410.9

## Solar

### (1.16.1.1) Own or control operations which use this power generation source

Select from:

☒ Yes



#### (1.16.1.2) Nameplate capacity (MW)

222

#### (1.16.1.4) Net electricity generation (GWh)

382.2

### Marine

#### (1.16.1.1) Own or control operations which use this power generation source

Select from:

☒ No

### Other renewable

#### (1.16.1.1) Own or control operations which use this power generation source

Select from:

☒ No

### Other non-renewable

#### (1.16.1.1) Own or control operations which use this power generation source

Select from:

☒ No

### Total

#### (1.16.1.2) Nameplate capacity (MW)

1237

(1.16.1.4) Net electricity generation (GWh)

2900.2

(1.24) Has your organization mapped its value chain?

	Value chain mapped	Primary reason for not mapping your upstream value chain or any value chain stages
	<i>Select from:</i> <input checked="" type="checkbox"/> No, and we do not plan to do so within the next two years	<i>Select from:</i> <input checked="" type="checkbox"/> Not an immediate strategic priority

## **C2. Identification, assessment, and management of dependencies, impacts, risks, and opportunities**

**(2.1) How does your organization define short-, medium-, and long-term time horizons in relation to the identification, assessment, and management of your environmental dependencies, impacts, risks, and opportunities?**

### **Short-term**

**(2.1.1) From (years)**

1

**(2.1.3) To (years)**

5

**(2.1.4) How this time horizon is linked to strategic and/or financial planning**

*These are general guidelines for how we think of time frames regarding climate-related topics.*

### **Medium-term**

**(2.1.1) From (years)**

6

**(2.1.3) To (years)**

15

**(2.1.4) How this time horizon is linked to strategic and/or financial planning**

*These are general guidelines for how we think of time frames regarding climate-related topics.*

Long-term

(2.1.1) From (years)

16

(2.1.2) Is your long-term time horizon open ended?

Select from:

☒ Yes

(2.1.4) How this time horizon is linked to strategic and/or financial planning

These are general guidelines for how we think of time frames regarding climate-related topics.

(2.2) Does your organization have a process for identifying, assessing, and managing environmental dependencies and/or impacts?

	Process in place	Dependencies and/or impacts evaluated in this process
	Select from: <input checked="" type="checkbox"/> Yes	Select from: <input checked="" type="checkbox"/> Both dependencies and impacts

**(2.2.1) Does your organization have a process for identifying, assessing, and managing environmental risks and/or opportunities?**

	Process in place	Risks and/or opportunities evaluated in this process	Is this process informed by the dependencies and/or impacts process?
	<i>Select from:</i> <input checked="" type="checkbox"/> Yes	<i>Select from:</i> <input checked="" type="checkbox"/> Both risks and opportunities	<i>Select from:</i> <input checked="" type="checkbox"/> Yes

**(2.2.2) Provide details of your organization's process for identifying, assessing, and managing environmental dependencies, impacts, risks, and/or opportunities.**

**Row 1**

**(2.2.2.1) Environmental issue**

*Select all that apply*

- ☒ Climate change
- ☒ Water
- ☒ Biodiversity

**(2.2.2.2) Indicate which of dependencies, impacts, risks, and opportunities are covered by the process for this environmental issue**

*Select all that apply*

- ☒ Dependencies
- ☒ Impacts
- ☒ Risks
- ☒ Opportunities

### (2.2.2.3) Value chain stages covered

*Select all that apply*

- ☒ Direct operations
- ☒ Upstream value chain
- ☒ Downstream value chain

### (2.2.2.4) Coverage

*Select from:*

- ☒ Partial

### (2.2.2.7) Type of assessment

*Select from:*

- ☒ Qualitative and quantitative

### (2.2.2.8) Frequency of assessment

*Select from:*

- ☒ More than once a year

### (2.2.2.9) Time horizons covered

*Select all that apply*

- ☒ Short-term
- ☒ Medium-term
- ☒ Long-term

### (2.2.2.10) Integration of risk management process

*Select from:*

- ☒ Integrated into multi-disciplinary organization-wide risk management process

### (2.2.2.11) Location-specificity used

*Select all that apply*

- ☒ Site-specific
- ☒ Local
- ☒ Sub-national
- ☒ National

### (2.2.2.14) Partners and stakeholders considered

*Select all that apply*

- ☒ Customers
- ☒ Employees
- ☒ Investors
- ☒ Local communities

### (2.2.2.15) Has this process changed since the previous reporting year?

*Select from:*

- ☒ No

### (2.2.2.16) Further details of process

*Enterprise-wide risk assessment and oversight are fundamental responsibilities of our board and explained in detail on page 24 of the 2024 10K document found at <https://www.mgeenergy.com/MGEEnergy/media/Library/documents/sec-reports/sec-forms-10k-10q/20241231-10k.pdf>*

## (2.2.7) Are the interconnections between environmental dependencies, impacts, risks and/or opportunities assessed?

### (2.2.7.1) Interconnections between environmental dependencies, impacts, risks and/or opportunities assessed

*Select from:*

- ☒ Yes

(2.2.7.2) Description of how interconnections are assessed

One way in which we recognize these interconnections is through our Environmental Management System (EMS). In 2024, we continued efforts under our Wisconsin Department of Natural Resources (WDNR) Green Tier certification, which recognizes environmental leadership and commits MGE to a superior level of transparency and accountability. MGE's primary goal in the expanded contract with the WDNR is to cover all MGE operations under our EMS. An EMS is a continuous improvement process that evaluates, prioritizes and manages environmental risks. MGE's expanded EMS has undergone three external compliance audits and three EMS audits, resulting in recommendations to the WDNR that MGE continue in the Green Tier program. As a participant in the highest level of the WDNR's Green Tier program, MGE's EMS is required to be aligned with ISO 14001, an internationally recognized EMS, to manage the Company's operational environmental impacts, opportunities and risks. More information on the WDNR Green Tier Program and MGE's participation can be found in the MGE Corporate Sustainability Report. <https://www.mge.com/MGE/media/MGE-Library/documents/general/2024-corporate-responsibility-sustainability-report-20250414.pdf>

(2.3) Have you identified priority locations across your value chain?

	Identification of priority locations
	Select from: <input checked="" type="checkbox"/> Yes, we are currently in the process of identifying priority locations

(2.4) How does your organization define substantive effects on your organization?

Risks

(2.4.1) Type of definition

- Select all that apply
- ☒ Qualitative
  - ☒ Quantitative



## (2.4.2) Indicator used to define substantive effect

Select from:

☒ Other, please specify :Our Board of Directors oversees and reviews trends in economic, business and commodity market conditions and legislative and regulatory initiatives as part of the Company's Enterprise Risk Management program. See the MGEE 2024 10k document.

## Opportunities

### (2.4.1) Type of definition

Select all that apply

☒ Qualitative

☒ Quantitative

### (2.4.2) Indicator used to define substantive effect

Select from:

☒ Other, please specify :Opportunity indicators and thresholds are numerous and opportunity-dependent. Our climate strategy includes achieving our goal of net-zero carbon electricity by 2050.

### (2.4.7) Application of definition

*Opportunities within this strategy include: - Decarbonizing our energy supply cost-effectively. - Partnering with our customers in new, innovative ways to manage their energy use. - Electrifying transportation, the leading contributor of GHG emissions, and electrifying other end uses. - Building a more dynamic, integrated grid to enable new technologies. - Balancing this transition to ensure all our diverse customers benefit.*

**(2.5) Does your organization identify and classify potential water pollutants associated with its activities that could have a detrimental impact on water ecosystems or human health?**

### (2.5.1) Identification and classification of potential water pollutants

Select from:

☒ Yes, we identify and classify our potential water pollutants

## (2.5.2) How potential water pollutants are identified and classified

*MGE environmental staff monitor federal, state and local rules that regulate the discharge of water pollutants. The team identifies and classifies potential water pollutants based on environmental regulatory requirements and the compliance strategies associated with the requirements. Specific water pollutants of concern are derived from the Clean Water Act (CWA), primarily the CWA's Water Quality Standards (WQS), but also specific regulations such as the Section 316(a) Thermal Discharge, Section 316(b) Cooling Water Intake Structures and the Steam Electric Effluent Limitations Guidelines (ELGs). In Wisconsin, the Department of Natural Resources (WDNR) has been delegated permitting authority for the administration of NPDES operating permits. Applicable regulations are incorporated into facility-specific or general wastewater operating permits which aim to protect and maintain the chemical, physical, and biological integrity of waters of the United States. MGE conducts all required studies and reports for its permits and permit renewals. MGE staff complete required compliance activities including routine sampling.*

## (2.5.1) Describe how your organization minimizes the adverse impacts of potential water pollutants on water ecosystems or human health associated with your activities.

### Row 1

#### (2.5.1.1) Water pollutant category

Select from:

☒ Oil

#### (2.5.1.2) Description of water pollutant and potential impacts

*Oil is used for direct operations at MGE facilities. It has the potential to impact water quality if it is spilled.*

#### (2.5.1.3) Value chain stage

Select all that apply

☒ Direct operations

#### (2.5.1.4) Actions and procedures to minimize adverse impacts

Select all that apply

☒ Assessment of critical infrastructure and storage condition (leakages, spillages, pipe erosion etc.) and their resilience

☒ Industrial and chemical accidents prevention, preparedness, and response

- ☒ Provision of best practice instructions on product use

#### (2.5.1.5) Please explain

*MGE facilities minimize the adverse impacts of oil pollutants though implementing Spill Prevention Control and Countermeasure (SPCC) plans to prevent spills from occurring. Many of our facilities also utilize oil water separators or oil detection equipment to prevent oil from discharging. Procedures are in place for the transfer of oil to and from storage tanks, and employees are trained at a minimum annually.*

### Row 2

#### (2.5.1.1) Water pollutant category

Select from:

- ☒ Phosphates

#### (2.5.1.2) Description of water pollutant and potential impacts

*Phosphorus is a common additive found in cooling water systems for its corrosion inhibiting properties. Excess phosphorus in freshwater bodies can cause water quality issues.*

#### (2.5.1.3) Value chain stage

Select all that apply

- ☒ Direct operations

#### (2.5.1.4) Actions and procedures to minimize adverse impacts

Select all that apply

- ☒ Beyond compliance with regulatory requirements
- ☒ Reduction or phase out of hazardous substances

### (2.5.1.5) Please explain

*MGE has already phased out the use of phosphorus-containing additives in our cooling water systems. Another way MGE supports clean lakes is through Yahara WINS. This collaborative water cleanup effort began as a pilot and expanded to a 20-year program to reduce phosphorus in our watershed. MGE supports this project through financial support from the MGE Foundation and through service on its technical advisory board, the Yahara Watershed Improvement Network Group. A collaborative approach pools the resources and expertise of community partners. It employs the strategy of watershed adaptive management in which all sources of phosphorus pollution are addressed together to meet water quality goals. Yahara WINS is exceeding expectations for modeled phosphorus reductions and is on track to meet its 20-year project goals. In 2024, the program reported 59,124 pounds of phosphorus reduced, which was greater than its goal of 52,648 pounds. The 2024 Yahara WINS Annual Report can be found here: <https://yaharawins.org/resources/annual-reports/>*

### Row 3

### (2.5.1.1) Water pollutant category

Select from:

☒ Other synthetic organic compounds

### (2.5.1.2) Description of water pollutant and potential impacts

*PCBs have in the past been used in insulating mineral oil used in electrical equipment. MGE has conducted a project to test, inventory, and phase out any mineral oil found to contain PCBs.*

### (2.5.1.3) Value chain stage

Select all that apply

☒ Direct operations

### (2.5.1.4) Actions and procedures to minimize adverse impacts

Select all that apply

☒ Beyond compliance with regulatory requirements

☒ Reduction or phase out of hazardous substances

#### **(2.5.1.5) Please explain**

*MGE conducted an extensive inventory of the PCB content in oil-filled electrical equipment and has completed the removal of all PCB-contaminated transformers from service.*

## C3. Disclosure of risks and opportunities

**(3.1) Have you identified any environmental risks which have had a substantive effect on your organization in the reporting year, or are anticipated to have a substantive effect on your organization in the future?**

### Climate change

#### (3.1.1) Environmental risks identified

Select from:

☒ Yes, both in direct operations and upstream/downstream value chain

### Water

#### (3.1.1) Environmental risks identified

Select from:

☒ No

#### (3.1.2) Primary reason why your organization does not consider itself to have environmental risks in your direct operations and/or upstream/downstream value chain

Select from:

☒ Environmental risks exist, but none with the potential to have a substantive effect on our organization

#### (3.1.3) Please explain

*MGE's facilities operate in a region with abundant water. MGE has plans and collaborative water agreements in place with stakeholders to address water usage at facilities it operates. In addition, MGE continues to transition its electric generation fleet by constructing more renewable sources (wind and solar). Numerous environmental laws and regulations govern many aspects of our present and future operations. These include: air emissions limits and reporting requirements; ambient air quality standards; water quality; water intake and discharges; wetlands; solid and hazardous waste; handling and disposal of hazardous substances; protection of endangered resources, such as threatened and endangered species, protection of cultural resources and archaeological sites; remediation and management of contaminated sites; and control of potential pollution from electric and gas construction sites.*

**(3.1.1) Provide details of the environmental risks identified which have had a substantive effect on your organization in the reporting year, or are anticipated to have a substantive effect on your organization in the future.**

## **Climate change**

### **(3.1.1.1) Risk identifier**

Select from:

☒ Risk1

### **(3.1.1.3) Risk types and primary environmental risk driver**

Policy

☒ Changes to regulation of existing products and services

### **(3.1.1.4) Value chain stage where the risk occurs**

Select from:

☒ Direct operations

### **(3.1.1.6) Country/area where the risk occurs**

Select all that apply

☒ United States of America

### **(3.1.1.9) Organization-specific description of risk**

*We are subject to extensive government regulation in our business, which affects our costs and responsiveness to changing events and circumstances. Our business is subject to regulation at the State and Federal levels. The regulations adopted by the State and Federal agencies affect how we do business, our ability to undertake specified actions since pre-approval or authorization may be required for projects, the costs of operations, and the rates charged to recover those costs. Our ability to attract capital also depends, in part, upon our ability to recover our costs and obtain a fair return for shareholders.*

### (3.1.1.12) Time horizon over which the risk is anticipated to have a substantive effect on the organization

Select all that apply

- ☒ Short-term
- ☒ Medium-term
- ☒ Long-term

### (3.1.1.13) Likelihood of the risk having an effect within the anticipated time horizon

Select from:

- ☒ About as likely as not

### (3.1.1.14) Magnitude

Select from:

- ☒ Unknown

### (3.1.1.17) Are you able to quantify the financial effect of the risk?

Select from:

- ☒ No

### (3.1.1.26) Primary response to risk

Compliance, monitoring and targets

- ☒ Greater due diligence

### (3.1.1.29) Description of response

*MGE has a process in place to evaluate and to anticipate regulatory and legislative developments on an ongoing basis. We review the international and national science on carbon reduction expectations. Our company goals are consistent with current climate science. MGE has set a goal of net-zero carbon electricity by 2050. We continue to evaluate potential impacts from mandates and regulations of greenhouse gas emissions on our business strategy and our pace toward our goals.*



## Climate change

### (3.1.1.1) Risk identifier

Select from:

☒ Risk3

### (3.1.1.3) Risk types and primary environmental risk driver

Acute physical

☒ Storm (including blizzards, dust and sandstorm)

### (3.1.1.4) Value chain stage where the risk occurs

Select from:

☒ Direct operations

### (3.1.1.6) Country/area where the risk occurs

Select all that apply

☒ United States of America

### (3.1.1.9) Organization-specific description of risk

We are affected by weather, which affects customer demand and can affect the operation of our facilities. This risk is further discussed on page 19 of our Form 10K. See <https://www.mgeenergy.com/MGEEnergy/media/Library/documents/sec-reports/sec-forms-10k-10q/20241231-10k.pdf>

### (3.1.1.12) Time horizon over which the risk is anticipated to have a substantive effect on the organization

Select all that apply

☒ Short-term

### (3.1.1.13) Likelihood of the risk having an effect within the anticipated time horizon

Select from:

☒ About as likely as not

### (3.1.1.14) Magnitude

Select from:

☒ Medium

### (3.1.1.17) Are you able to quantify the financial effect of the risk?

Select from:

☒ No

### (3.1.1.29) Description of response

*MGE has plans in place to prevent and mitigate damage from unplanned events including extreme weather and storms. The intent is to ensure reliability for our customers and the safety of our employees and our community in response to these events. Having a well-defined and practiced All Hazards Response Plan (AHRP) is critical to managing and responding appropriately to emergency situations. MGE's AHRP encompasses everything from storm response to cyberattacks. The incident command structure within the plan oversees logistics, operations and planning. It is supported by communications, legal, environmental, safety and IT resources. A multiyear grid modernization effort also is underway across the Madison area to underground distribution lines, where possible, and install new grid monitoring and control technology to reduce the duration of storm-related outages.*

## Climate change

### (3.1.1.1) Risk identifier

Select from:

☒ Risk2

### (3.1.1.3) Risk types and primary environmental risk driver

Market

☒ Other market risk, please specify :Delays in completion of significant capital projects.

#### (3.1.1.4) Value chain stage where the risk occurs

Select from:

☒ Direct operations

#### (3.1.1.6) Country/area where the risk occurs

Select all that apply

☒ United States of America

#### (3.1.1.9) Organization-specific description of risk

We face risk in connection with the completion of significant capital projects. This risk is further discussed on page 22 of our Form 10K. See <https://www.mgeenergy.com/MGEEnergy/media/Library/documents/sec-reports/sec-forms-10k-10q/20241231-10k.pdf>

#### (3.1.1.12) Time horizon over which the risk is anticipated to have a substantive effect on the organization

Select all that apply

☒ Short-term

☒ Medium-term

☒ Long-term

#### (3.1.1.13) Likelihood of the risk having an effect within the anticipated time horizon

Select from:

☒ About as likely as not

#### (3.1.1.14) Magnitude

Select from:

☒ Medium-low

(3.1.1.17) Are you able to quantify the financial effect of the risk?

Select from:

☒ No

(3.1.1.29) Description of response

MGE mitigates the risk of renewable energy project delays through its reserve margin of energy production, project controls, and operation of dispatchable assets.

(3.3) In the reporting year, was your organization subject to any fines, enforcement orders, and/or other penalties for water-related regulatory violations?

	Water-related regulatory violations
	Select from: <input checked="" type="checkbox"/> No

(3.5) Are any of your operations or activities regulated by a carbon pricing system (i.e. ETS, Cap & Trade or Carbon Tax)?

Select from:

☒ No, and we do not anticipate being regulated in the next three years

**(3.6) Have you identified any environmental opportunities which have had a substantive effect on your organization in the reporting year, or are anticipated to have a substantive effect on your organization in the future?**

**Climate change**

**(3.6.1) Environmental opportunities identified**

*Select from:*

☒ Yes, we have identified opportunities, and some/all are being realized

**Water**

**(3.6.1) Environmental opportunities identified**

*Select from:*

☒ No

**(3.6.2) Primary reason why your organization does not consider itself to have environmental opportunities**

*Select from:*

☒ Opportunities exist, but none anticipated to have a substantive effect on organization

**(3.6.1) Provide details of the environmental opportunities identified which have had a substantive effect on your organization in the reporting year, or are anticipated to have a substantive effect on your organization in the future.**

**Climate change**

**(3.6.1.1) Opportunity identifier**

*Select from:*

☒ Opp1

### (3.6.1.3) Opportunity type and primary environmental opportunity driver

Energy source

- ☒ Use of low-carbon energy sources

### (3.6.1.4) Value chain stage where the opportunity occurs

Select from:

- ☒ Direct operations

### (3.6.1.5) Country/area where the opportunity occurs

Select all that apply

- ☒ United States of America

### (3.6.1.8) Organization specific description

*MGE's solar, wind and battery storage projects are a major step toward deep decarbonization and greater use of clean energy sources in pursuit of our net-zero carbon electricity goal. Additionally, MGE seeks to reduce its use of higher-emitting generation sources and works to help customers with energy efficiency and electrification, including the electrification of transportation. Since 2015, MGE has added more than 250 megawatts (MW) of solar and 93 MW of wind capacity to its electric generation portfolio and continues to evaluate additional renewable energy opportunities to serve customers.*

### (3.6.1.9) Primary financial effect of the opportunity

Select from:

- ☒ Returns on investment in low-emission technology

### (3.6.1.10) Time horizon over which the opportunity is anticipated to have a substantive effect on the organization

Select all that apply

- ☒ Short-term

### (3.6.1.11) Likelihood of the opportunity having an effect within the anticipated time horizon

Select from:

☒ Likely (66–100%)

### (3.6.1.12) Magnitude

Select from:

☒ Medium-high

### (3.6.1.14) Anticipated effect of the opportunity on the financial position, financial performance and cash flows of the organization in the selected future time horizons

*Transitioning to cleaner fuels and increasing our investments in renewable energy are key strategies to achieving net-zero carbon electricity by 2050. Increasing our renewable energy resources creates new investment opportunities while also reducing our exposure to potential future climate regulations. As a regulated utility, our financial earnings are driven by the allowed specific rate of return on assets included in rate base. Increasing our investments in renewable energy reduces our reliance on coal-fired generation and increases the percentage of cleaner technologies in our rate base. More than half of the Company's projected capital expenditures from 2025 through 2029 will support generation investments to achieve the Company's targeted carbon reductions.*

### (3.6.1.15) Are you able to quantify the financial effects of the opportunity?

Select from:

☒ No

### (3.6.1.26) Strategy to realize opportunity

*Our strategies for achieving our carbon reduction goals are investing in renewable energy, reducing the company's reliance on higher-emitting electricity generating sources, electrifying transportation and other end uses, and advancing energy efficiency. Progress toward these objectives is updated at [www.mge.com/about-mge/electric-system](http://www.mge.com/about-mge/electric-system)*

## Climate change

### (3.6.1.1) Opportunity identifier

Select from:

☒ Opp2

### (3.6.1.3) Opportunity type and primary environmental opportunity driver

Products and services

☒ Ability to diversify business activities

### (3.6.1.4) Value chain stage where the opportunity occurs

Select from:

☒ Direct operations

### (3.6.1.5) Country/area where the opportunity occurs

Select all that apply

☒ United States of America

### (3.6.1.8) Organization specific description

*MGE is working to achieve a more sustainable energy future by investing in cost-effective, renewable generation; in new, innovative low-emission technologies; and, in customer engagement, programs, products and services to advance our decarbonization strategies, such as energy efficiency and electrification. Our Renewable Energy Rider and Shared Solar programs help to reduce MGE's carbon emissions while providing customers the ability to purchase locally generated, cost-effective, renewable energy to meet their needs. Our demand response program, MGE Connect, partners with MGE's electric customers to shift energy use to reduce peak demand while our electric vehicle (EV) programs and resources help to advance sustainable transportation and offer MGE the opportunity to manage EV charging to better manage the grid for the benefit of all customers.*



### **(3.6.1.9) Primary financial effect of the opportunity**

Select from:

- ☒ Returns on investment in low-emission technology

### **(3.6.1.10) Time horizon over which the opportunity is anticipated to have a substantive effect on the organization**

Select all that apply

- ☒ Medium-term

### **(3.6.1.11) Likelihood of the opportunity having an effect within the anticipated time horizon**

Select from:

- ☒ Virtually certain (99–100%)

### **(3.6.1.12) Magnitude**

Select from:

- ☒ Medium

### **(3.6.1.14) Anticipated effect of the opportunity on the financial position, financial performance and cash flows of the organization in the selected future time horizons**

*Offering customers options to participate in programs that grow renewable energy and advance energy efficiency and electrification drives investment in clean energy and facilitates more efficient grid management. In turn, these programs help MGE to achieve our deep decarbonization goals by growing our use of clean energy and managing demand.*

### **(3.6.1.15) Are you able to quantify the financial effects of the opportunity?**

Select from:

- ☒ No

### (3.6.1.26) Strategy to realize opportunity

*Examples of specific programs to realize this opportunity include growing renewable energy through our Renewable Energy Rider and Shared Solar programs; managing peak demand through our demand response program, MGE Connect; researching and demonstrating residential solar/battery storage projects; researching charging patterns, grid impacts and remote management of EV charging through our EV programs and projects, such as Charge@Home and Charge Ahead; and reducing peak demand and shifting energy use through our MyMeter (formerly On Demand Savings) program.*

## Climate change

### (3.6.1.1) Opportunity identifier

Select from:

☒ Opp3

### (3.6.1.3) Opportunity type and primary environmental opportunity driver

Resource efficiency

☒ Other resource efficiency opportunity, please specify :Increased development of electric grid.

### (3.6.1.4) Value chain stage where the opportunity occurs

Select from:

☒ Direct operations

### (3.6.1.5) Country/area where the opportunity occurs

Select all that apply

☒ United States of America

### (3.6.1.8) Organization specific description

*Capital investments in our electric grid infrastructure earn a rate of return, can reduce our operating costs and can improve access to demand management options for our customers.*

### (3.6.1.9) Primary financial effect of the opportunity

Select from:

☒ Returns on investment in low-emission technology

### (3.6.1.10) Time horizon over which the opportunity is anticipated to have a substantive effect on the organization

Select all that apply

☒ Medium-term

### (3.6.1.11) Likelihood of the opportunity having an effect within the anticipated time horizon

Select from:

☒ Virtually certain (99–100%)

### (3.6.1.12) Magnitude

Select from:

☒ Medium

### (3.6.1.14) Anticipated effect of the opportunity on the financial position, financial performance and cash flows of the organization in the selected future time horizons

*Capital investments in our electric grid infrastructure can reduce our operating costs and improve access to demand management options for our customers. Investment in these grid technologies is a part of advancing our strategies for achieving net-zero carbon electricity by 2050. As a regulated utility, our financial earnings are driven by the allowed specific rate of return on assets included in rate base.*

### (3.6.1.15) Are you able to quantify the financial effects of the opportunity?

Select from:

☒ No

### **(3.6.1.26) Strategy to realize opportunity**

*MGE is investing in infrastructure improvements to enhance the electric distribution grid to support and integrate new technology while working to ensure reliable and resilient service at a reasonable cost. Modernization of the grid includes projects that can improve the two-way flow of electricity from traditional sources as well as distributed sources of renewable energy as we transition to greater use of cleaner energy sources. Additional initiatives to further enhance reliability and resiliency include Distribution Automation; Asset Renewal projects, such as moving overhead wires underground and voltage conversions; and physical and technological security, communication, and control upgrades. These projects help to improve the resiliency, reliability, security, and safety of the grid while also enabling new renewable energy sources and advancing innovative customer programs and technologies to deliver a more integrated and efficient grid for the benefit of all customers.*

## C4. Governance

### (4.1) Does your organization have a board of directors or an equivalent governing body?

#### (4.1.1) Board of directors or equivalent governing body

*Select from:*

☒ Yes

#### (4.1.2) Frequency with which the board or equivalent meets

*Select from:*

☒ More frequently than quarterly

#### (4.1.3) Types of directors your board or equivalent is comprised of

*Select all that apply*

☒ Executive directors or equivalent

☒ Non-executive directors or equivalent

☒ Independent non-executive directors or equivalent

#### (4.1.4) Board diversity and inclusion policy

*Select from:*

☒ No

#### (4.1.1) Is there board-level oversight of environmental issues within your organization?

	Board-level oversight of this environmental issue
Climate change	Select from: <input checked="" type="checkbox"/> Yes
Water	Select from: <input checked="" type="checkbox"/> Yes
Biodiversity	Select from: <input checked="" type="checkbox"/> Yes

#### (4.1.2) Identify the positions (do not include any names) of the individuals or committees on the board with accountability for environmental issues and provide details of the board's oversight of environmental issues.

##### Climate change

##### (4.1.2.1) Positions of individuals or committees with accountability for this environmental issue

Select all that apply

- ☒ Board chair
- ☒ Chief Executive Officer (CEO)
- ☒ Other, please specify :Board of Directors

##### (4.1.2.4) Frequency with which this environmental issue is a scheduled agenda item

Select from:

- ☒ Scheduled agenda item in some board meetings – at least annually

#### (4.1.2.5) Governance mechanisms into which this environmental issue is integrated

Select all that apply

- ☒ Reviewing and guiding annual budgets
- ☒ Overseeing and guiding scenario analysis
- ☒ Approving and/or overseeing employee incentives
- ☒ Overseeing and guiding major capital expenditures
- ☒ Overseeing and guiding acquisitions, mergers, and divestitures
- ☒ Overseeing and guiding the development of a climate transition plan

#### (4.1.2.7) Please explain

*Our Chairman and CEO As the individual with primary responsibility for managing the Company's day-to-day operations and for executing on the Company's vision and strategy, our CEO is best positioned to chair regular board meetings as we discuss key business and strategic issues. Climate-related issues are among the key business and strategic issues. Our Board of Directors Our board has oversight of the Company's ESG and climate-related matters. This oversight includes review of environmental risks and mitigation as well as assessment of current and/or future environmental regulations. It also includes review of the Company's corporate responsibility, environmental and sustainability performance and MGE's annual Corporate Responsibility and Sustainability Report. Directors understand corporate responsibility and sustainability are integral to the Company's long-term success and share management's commitment in these areas, from long-term and strategic direction to day-to-day business practices throughout the organization. To help facilitate effective oversight of ESG-related matters, the board receives timely and relevant information on a regular basis related to the Company's sustainability initiatives and performance and a wide range of ESG topics, including diversity, equity and inclusion, workforce and culture, safety, human rights, supply chain and other ESG topics. The board has ten regular full board meetings each year. Board meetings are structured to provide for regular presentations by and active dialogue with MGE management. Subject matter experts from across the Company regularly present to the board on issues of strategic importance. These regular interactions provide useful information and insight relative to critical business initiatives and corporate strategy, including environmental performance and sustainability, and risk management and oversight. In addition, the board takes advantage of external expertise as needed on key strategic topics. The board's engagement with management and the Company's participation in third-party benchmarking and evaluation programs help to assess performance and promote continuous improvement.*

#### (4.2) Does your organization's board have competency on environmental issues?

##### Climate change

#### (4.2.1) Board-level competency on this environmental issue

Select from:

- ☒ Yes

### (4.2.2) Mechanisms to maintain an environmentally competent board

*Select all that apply*

- ☒ Having at least one board member with expertise on this environmental issue
- ☒ Other, please specify :The board conducts an annual self-assessment including an extensive survey that covers board structure, meetings, committees, key responsibilities and management. In addition, the board periodically evaluates the directors' expertise and experience.

### (4.2.3) Environmental expertise of the board member

Experience

- ☒ Executive-level experience in a role focused on environmental issues
- ☒ Experience in an organization that is exposed to environmental-scrutiny and is going through a sustainability transition
- ☒ Active member of an environmental committee or organization

## Water

### (4.2.1) Board-level competency on this environmental issue

*Select from:*

- ☒ Yes

### (4.2.2) Mechanisms to maintain an environmentally competent board

*Select all that apply*

- ☒ Having at least one board member with expertise on this environmental issue
- ☒ Other, please specify :Many of our Board members have experience in and understanding of environmental policy and compliance, impacts and risk, and emerging issues and opportunities for greater sustainability. This includes water resource impacts, risks and opportunities.

### (4.2.3) Environmental expertise of the board member

Experience

- ☒ Executive-level experience in a role focused on environmental issues
- ☒ Experience in an organization that is exposed to environmental-scrutiny and is going through a sustainability transition



☒ Active member of an environmental committee or organization

**(4.3) Is there management-level responsibility for environmental issues within your organization?**

	Management-level responsibility for this environmental issue
Climate change	Select from: <input checked="" type="checkbox"/> Yes
Water	Select from: <input checked="" type="checkbox"/> Yes
Biodiversity	Select from: <input checked="" type="checkbox"/> Yes

**(4.3.1) Provide the highest senior management-level positions or committees with responsibility for environmental issues (do not include the names of individuals).**

**Climate change**

**(4.3.1.1) Position of individual or committee with responsibility**

Executive level

☒ Chief Executive Officer (CEO)

#### (4.3.1.2) Environmental responsibilities of this position

Dependencies, impacts, risks and opportunities

- ☒ Assessing environmental dependencies, impacts, risks, and opportunities
- ☒ Managing environmental dependencies, impacts, risks, and opportunities

Policies, commitments, and targets

- ☒ Setting corporate environmental targets

Strategy and financial planning

- ☒ Developing a climate transition plan
- ☒ Implementing a climate transition plan

#### (4.3.1.4) Reporting line

Select from:

- ☒ Reports to the board directly

#### (4.3.1.5) Frequency of reporting to the board on environmental issues

Select from:

- ☒ More frequently than quarterly

#### (4.3.1.6) Please explain

*Our Chief Executive Officer (CEO) serves as the President of the Company and Chairman of the Board of Directors. Our CEO is the individual with primary responsibility for managing the Company's day-to-day operations and for executing on the Company's vision and strategy. Our CEO is best positioned to chair regular board meetings to discuss key business and strategic issues. This includes climate-related risks and opportunities. Although involved in all aspects of climate-related activities, our CEO is directly involved in developing/implementing transition plans, assessing/managing risk and opportunities, and integrating climate-related issues into our strategy and setting targets. Our Company seeks to foster a proactive and forward-thinking approach to ESG-related matters, beginning with board oversight of and executive leadership on key topics and emerging issues. The board takes seriously its responsibility to oversee corporate responsibility and environmental performance of the Company. Directors are kept informed and educated through collaboration with and numerous presentations by officers of the Company and various subject matter experts, including experts from outside the Company and through industry and director training opportunities and reports provided to them by senior management on a regular basis. Our governance structure helps to ensure that oversight and management of ESG and sustainability-related risks and initiatives throughout the Company are incorporated into our long-term strategy and day-to-day management and operations. Our approach to these matters extends*

from the Board of Directors to our executive officers to our Sustainability Steering Team, leaders and internal subject matter experts. Along with the CEO, the other key positions are summarized.

## Climate change

### (4.3.1.1) Position of individual or committee with responsibility

Executive level

- ☒ Chief Financial Officer (CFO)

### (4.3.1.2) Environmental responsibilities of this position

Dependencies, impacts, risks and opportunities

- ☒ Assessing environmental dependencies, impacts, risks, and opportunities
- ☒ Managing environmental dependencies, impacts, risks, and opportunities

Strategy and financial planning

- ☒ Managing annual budgets related to environmental issues
- ☒ Managing major capital and/or operational expenditures relating to environmental issues

### (4.3.1.4) Reporting line

Select from:

- ☒ Reports to the Chief Executive Officer (CEO)

### (4.3.1.5) Frequency of reporting to the board on environmental issues

Select from:

- ☒ More frequently than quarterly

#### (4.3.1.6) Please explain

*The VP Chief Financial Officer and Treasurer serves on the Sustainability Executive Committee and reports to the CEO. Although involved in many aspects of climate-related activities, our VP Chief Financial Officer and Treasurer is directly involved in managing annual budgets for climate mitigation activities, managing major capital and/or operational expenditures related to low carbon products/services, and assessing/managing risk and opportunities.*

### Climate change

#### (4.3.1.1) Position of individual or committee with responsibility

Executive level

☒ Other C-Suite Officer, please specify :VP General Counsel and Secretary

#### (4.3.1.2) Environmental responsibilities of this position

Dependencies, impacts, risks and opportunities

☒ Assessing environmental dependencies, impacts, risks, and opportunities

☒ Managing environmental dependencies, impacts, risks, and opportunities

Engagement

☒ Managing public policy engagement related to environmental issues

Policies, commitments, and targets

☒ Measuring progress towards environmental corporate targets

☒ Setting corporate environmental targets

#### (4.3.1.4) Reporting line

Select from:

☒ Reports to the Chief Executive Officer (CEO)

#### (4.3.1.5) Frequency of reporting to the board on environmental issues

Select from:

- ☒ More frequently than quarterly

#### (4.3.1.6) Please explain

*The VP General Counsel and Secretary oversees Legal Services, Government Affairs, and Safety, Sustainability and Environmental Affairs, is the Corporate Secretary, serves on the Sustainability Executive Team, and reports directly to the CEO. The VP General Counsel and Secretary is our officer with primary sustainability and ESG responsibilities. Although involved in many aspects of climate-related activities, our VP General Counsel and Secretary is directly involved in managing public policy engagement, setting targets, monitoring progress on targets, and assessing/managing risk and opportunities.*

### Climate change

#### (4.3.1.1) Position of individual or committee with responsibility

Executive level

- ☒ Other C-Suite Officer, please specify :VP Energy Operations

#### (4.3.1.2) Environmental responsibilities of this position

Dependencies, impacts, risks and opportunities

- ☒ Assessing environmental dependencies, impacts, risks, and opportunities  
☒ Managing environmental dependencies, impacts, risks, and opportunities

Strategy and financial planning

- ☒ Implementing a climate transition plan  
☒ Managing major capital and/or operational expenditures relating to environmental issues

#### (4.3.1.4) Reporting line

Select from:

- ☒ Reports to the Chief Executive Officer (CEO)

#### (4.3.1.5) Frequency of reporting to the board on environmental issues

Select from:

- ☒ More frequently than quarterly

#### (4.3.1.6) Please explain

*The VP-Energy Operations serves on the Sustainability Executive Committee and reports to the CEO. Among other duties, our VP-Energy Operations manages major capital and operational expenditures related to low-carbon products and services, implements climate transition plans and assess/manages climate-related risks/opportunities.*

### Climate change

#### (4.3.1.1) Position of individual or committee with responsibility

Committee

- ☒ Sustainability committee

#### (4.3.1.2) Environmental responsibilities of this position

Dependencies, impacts, risks and opportunities

- ☒ Assessing environmental dependencies, impacts, risks, and opportunities
- ☒ Managing environmental dependencies, impacts, risks, and opportunities

Policies, commitments, and targets

- ☒ Measuring progress towards environmental corporate targets
- ☒ Setting corporate environmental targets

Other

- ☒ Providing employee incentives related to environmental performance

#### **(4.3.1.6) Please explain**

*Our Sustainability Executive Team has officer representation from across the company to provide input and oversight to Steering Team direction and initiatives. In this capacity, the members monitor progress against objectives and assess/manage climate-related risks/opportunities. Our Sustainability Steering team is composed of employees from across the company. They manage our Environmental Management System, drive sustainability, engagement, benchmarking and continuous improvement initiatives. In this capacity, the members are primarily involved in engaging and providing climate-related opportunities to employees, setting targets/objectives, monitoring progress on objectives and assessing/managing risks/opportunities.*

### **(4.5) Do you provide monetary incentives for the management of environmental issues, including the attainment of targets?**

#### **Climate change**

#### **(4.5.1) Provision of monetary incentives related to this environmental issue**

Select from:

☒ Yes

#### **(4.5.3) Please explain**

*Compensation for our executive officers is described in detail beginning on page 30 of MGEE's 2025 Proxy Statement. See <https://www.mgeenergy.com/MGEEnergy/media/Library/documents/annual-reports/2024-proxy-20250327.pdf>*

#### **Water**

#### **(4.5.1) Provision of monetary incentives related to this environmental issue**

Select from:

☒ Yes

#### **(4.5.3) Please explain**

*Compensation for our executive officers is described in detail beginning on page 30 of MGEE's 2025 Proxy Statement. See <https://www.mgeenergy.com/MGEEnergy/media/Library/documents/annual-reports/2024-proxy-20250327.pdf>*

**(4.5.1) Provide further details on the monetary incentives provided for the management of environmental issues (do not include the names of individuals).**

## **Climate change**

### **(4.5.1.1) Position entitled to monetary incentive**

Board or executive level

☒ Corporate executive team

### **(4.5.1.2) Incentives**

*Select all that apply*

☒ Bonus – set figure

### **(4.5.1.3) Performance metrics**

Targets

☒ Progress towards environmental targets

Emission reduction

☒ Implementation of an emissions reduction initiative

### **(4.5.1.4) Incentive plan the incentives are linked to**

*Select from:*

☒ Short-Term Incentive Plan, or equivalent, only (e.g. contractual annual bonus)



#### (4.5.1.5) Further details of incentives

*Our executive officers, including the named executive officers, are partially compensated through annual short-term incentives or bonuses. The incentives are based on objective metric-specific targets, a subjective assessment of overall corporate performance, and a subjective assessment of individual performance.*

#### (4.5.1.6) How the position's incentives contribute to the achievement of your environmental commitments and/or climate transition plan

*The ESG component of performance includes: Promotes and improves a diverse, equitable and inclusive workplace; Advances the Company's Energy 2050 goals and framework; Advances MGE's movement towards the Utility of the Future; Maintains or improves culture of environmental stewardship; Prepares Environmental and Sustainability Report and reviews with board; Maintains and enhances position as your community energy company; and Provides a culture that attracts and motivates a high-performing workplace.*

### Water

#### (4.5.1.1) Position entitled to monetary incentive

Board or executive level

☒ Corporate executive team

#### (4.5.1.2) Incentives

Select all that apply

☒ Bonus – set figure

#### (4.5.1.3) Performance metrics

Targets

☒ Progress towards environmental targets

Emission reduction

☒ Implementation of an emissions reduction initiative

Resource use and efficiency

☒ Reduction of water withdrawals – direct operations

Engagement

☒ Increased engagement with suppliers on environmental issues

#### (4.5.1.4) Incentive plan the incentives are linked to

Select from:

☒ Short-Term Incentive Plan, or equivalent, only (e.g. contractual annual bonus)

#### (4.5.1.5) Further details of incentives

*Our executive officers, including the named executive officers, are partially compensated through annual short-term incentives or bonuses. The incentives are based on objective metric-specific targets, a subjective assessment of overall corporate performance, and a subjective assessment of individual performance.*

#### (4.5.1.6) How the position's incentives contribute to the achievement of your environmental commitments and/or climate transition plan

*Water resources, as part of environmental performance is captured in the ESG component of performance. ESG performance includes: Promotes and improves a diverse, equitable and inclusive workplace; Advances the Company's Energy 2050 goals and framework; Advances MGE's movement towards the Utility of the Future; Maintains or improves culture of environmental stewardship; Prepares Environmental and Sustainability Report and reviews with board; Maintains and enhances position as your community energy company; and Provides a culture that attracts and motivates a high-performing workplace.*

#### (4.6) Does your organization have an environmental policy that addresses environmental issues?

	Does your organization have any environmental policies?
	Select from: <input checked="" type="checkbox"/> Yes

## (4.6.1) Provide details of your environmental policies.

### Row 1

#### (4.6.1.1) Environmental issues covered

Select all that apply

- ☒ Climate change
- ☒ Water
- ☒ Biodiversity

#### (4.6.1.2) Level of coverage

Select from:

- ☒ Organization-wide

#### (4.6.1.3) Value chain stages covered

Select all that apply

- ☒ Direct operations

#### (4.6.1.4) Explain the coverage

*As your community energy company, MGE recognizes its responsibility to preserve and protect the environment while serving our communities with safe, reliable, affordable and sustainable energy. We are proactive and forward-thinking in our stewardship and promote sustainability with our partners, suppliers and employees as we work together to build a cleaner, smarter future. Our Environmental and Sustainability Policy can be found here <https://www.mge.com/sustainability/corporate-responsibility/environmental-policy>*

#### (4.6.1.5) Environmental policy content

Environmental commitments

- ☒ Commitment to comply with regulations and mandatory standards
- ☒ Commitment to stakeholder engagement and capacity building on environmental issues

Additional references/Descriptions

☒ Reference to timebound environmental milestones and targets

#### **(4.6.1.6) Indicate whether your environmental policy is in line with global environmental treaties or policy goals**

*Select all that apply*

☒ No, and we do not plan to align in the next two years

#### **(4.6.1.7) Public availability**

*Select from:*

☒ Publicly available

#### **(4.6.1.8) Attach the policy**

*Environmental Policy - Madison Gas and Electric.pdf*

### **(4.10) Are you a signatory or member of any environmental collaborative frameworks or initiatives?**

#### **(4.10.1) Are you a signatory or member of any environmental collaborative frameworks or initiatives?**

*Select from:*

☒ Yes

#### **(4.10.2) Collaborative framework or initiative**

*Select all that apply*

☒ Other, please specify :Wisconsin Monarch Collaborative

#### **(4.10.3) Describe your organization's role within each framework or initiative**

*We are a member of the Wisconsin Monarch Collaborative and evaluating participation in the Nationwide Candidate Conservation Agreement. We expect to clarify our direction on making a public commitment or endorsing initiatives within the next 2 years. MGE is a long term participant in the WDNR Green Tier program that*

*recognizes superior environmental performance which requires an Environmental Management System, annual reporting and auditing. We also serve on the Wisconsin Sustainable Business Council, the Fund for Lake Michigan, and the Yahara WINS phosphorous reduction initiative.*

**(4.11) In the reporting year, did your organization engage in activities that could directly or indirectly influence policy, law, or regulation that may (positively or negatively) impact the environment?**

**(4.11.1) External engagement activities that could directly or indirectly influence policy, law, or regulation that may impact the environment**

*Select all that apply*

- ☒ Yes, we engaged directly with policy makers
- ☒ Yes, we engaged indirectly through, and/or provided financial or in-kind support to a trade association or other intermediary organization or individual whose activities could influence policy, law, or regulation

**(4.11.2) Indicate whether your organization has a public commitment or position statement to conduct your engagement activities in line with global environmental treaties or policy goals**

*Select from:*

- ☒ No, and we do not plan to have one in the next two years

**(4.11.5) Indicate whether your organization is registered on a transparency register**

*Select from:*

- ☒ No

**(4.11.8) Describe the process your organization has in place to ensure that your external engagement activities are consistent with your environmental commitments and/or transition plan**

*MGE advocates for customers, shareholders and employees by building and maintaining relationships with policymakers; by working collaboratively with internal and external stakeholders to identify and address matters that impact the industry, goals and corporate strategies; and, by building coalitions with stakeholders, trade associations, employees, customer groups, utility associations and others to pursue and achieve common goals. MGE's corporate strategies include the company's commitment to providing safe, reliable, affordable energy consistent with its carbon reduction and net-zero carbon goals. MGE employs registered lobbyists and utilizes external lobbyists to engage policymakers at the local, state and federal levels to monitor legislation and policy proposals and to advocate for positions that*

are in the best interest of MGE employees, customers and shareholders. Reports of the company's lobbying activities (MGE Energy and/or MGE) can be found at the federal, state and local levels. Wisconsin lobbying reports can be found at the Wisconsin Ethics Commission, [lobbying.wi.gov](http://lobbying.wi.gov). MGE typically does not incur lobbying expenses at the federal or local level that would trigger a lobbying report; however, if it does, those expenses can be found at [lda.senate.gov](http://lda.senate.gov) and [lobbyingdisclosure.house.gov](http://lobbyingdisclosure.house.gov) and at [cityofmadison.com/clerk/lobbyists](http://cityofmadison.com/clerk/lobbyists), respectively. MGE belongs to a number of trade organizations and coalitions that provide expertise, training and research concerning important industry topics. Some trade associations also participate in the political process, including participation in lobbying. MGE does not control the political activity of its member trade associations, and in fact, may sometimes disagree with political positions taken by them. Trade associations must identify the portion of association dues used for lobbying and political activities to comply with tax rules. MGE collaborates with local and regional entities such as municipalities and collaboratives to advance decarbonization strategies and clean energy goals.

#### **(4.11.1) On what policies, laws, or regulations that may (positively or negatively) impact the environment has your organization been engaging directly with policy makers in the reporting year?**

##### **Row 1**

##### **(4.11.1.1) Specify the policy, law, or regulation on which your organization is engaging with policy makers**

*Public Service Commission of Wisconsin: Regulatory Approval for investments in new clean energy generation.*

##### **(4.11.1.2) Environmental issues the policy, law, or regulation relates to**

*Select all that apply*

☒ Climate change

##### **(4.11.1.3) Focus area of policy, law, or regulation that may impact the environment**

*Other*

☒ Other, please specify :Public Service Commission of Wisconsin - regulatory approval for clean energy investments.

##### **(4.11.1.4) Geographic coverage of policy, law, or regulation**

*Select from:*

☒ Sub-national

#### **(4.11.1.5) Country/area/region the policy, law, or regulation applies to**

*Select all that apply*

☒ United States of America

#### **(4.11.1.6) Your organization's position on the policy, law, or regulation**

*Select from:*

☒ Support with no exceptions

#### **(4.11.1.8) Type of direct engagement with policy makers on this policy, law, or regulation**

*Select all that apply*

☒ Other, please specify :As a regulated utility, we generally may not build/purchase new energy generating facilities without obtaining approval from the PSC of Wisconsin. To obtain approval, we engage with the PSCW in a public approval process.

#### **(4.11.1.10) Explain the relevance of this policy, law, or regulation to the achievement of your environmental commitments and/or transition plan, how this has informed your engagement, and how you measure the success of your engagement**

*Wisconsin law requires public utilities to prove that substantial investments in electric generation are necessary and cost effective. From 2015 through 2028, we expect approximately \$1 billion in new renewable energy generation. When we propose to add substantial new energy generating facilities, we seek approval from our State regulatory body (the Wisconsin Public Service Commission) to invest in those resources.*

#### **(4.11.1.11) Indicate if you have evaluated whether your organization's engagement on this policy, law, or regulation is aligned with global environmental treaties or policy goals**

*Select from:*

☒ Yes, we have evaluated, and it is aligned

#### **(4.11.1.12) Global environmental treaties or policy goals aligned with your organization's engagement on this policy, law or regulation**

*Select all that apply*

☒ Paris Agreement

**(4.11.2) Provide details of your indirect engagement on policy, law, or regulation that may (positively or negatively) impact the environment through trade associations or other intermediary organizations or individuals in the reporting year.**

**Row 1**

**(4.11.2.1) Type of indirect engagement**

*Select from:*

☒ Indirect engagement via a trade association

**(4.11.2.4) Trade association**

North America

☒ Edison Electric Institute (EII)

**(4.11.2.5) Environmental issues relevant to the policies, laws, or regulations on which the organization or individual has taken a position**

*Select all that apply*

☒ Climate change

**(4.11.2.6) Indicate whether your organization's position is consistent with the organization or individual you engage with**

*Select from:*

☒ Consistent

**(4.11.2.7) Indicate whether your organization attempted to influence the organization or individual's position in the reporting year**

*Select from:*

☒ No, we did not attempt to influence their position



#### **(4.11.2.8) Describe how your organization's position is consistent with or differs from the organization or individual's position, and any actions taken to influence their position**

*EEL's policy on clean energy and climate change can be found on its web site at <https://www.eei.org/en/issues-and-policy/clean-energy>. EEL may participate in the political process, including participating in lobbying on issues related to climate. MGE does not attempt to control the political activity of EEL, and in fact, may sometimes disagree with political positions taken by EEL. We attend meetings and discussions with EEL regarding policy matters, including climate change, and provide input to ensure that the company's perspectives are considered.*

#### **(4.11.2.9) Funding figure your organization provided to this organization or individual in the reporting year (currency)**

210600

#### **(4.11.2.10) Describe the aim of this funding and how it could influence policy, law or regulation that may impact the environment**

*This represents the membership dues for EEL.*

#### **(4.11.2.11) Indicate if you have evaluated whether your organization's engagement is aligned with global environmental treaties or policy goals**

Select from:

☒ No, we have not evaluated

### **Row 2**

#### **(4.11.2.1) Type of indirect engagement**

Select from:

☒ Indirect engagement via a trade association

#### **(4.11.2.4) Trade association**

North America

☒ American Gas Association

#### **(4.11.2.5) Environmental issues relevant to the policies, laws, or regulations on which the organization or individual has taken a position**

*Select all that apply*

☒ Climate change

#### **(4.11.2.6) Indicate whether your organization's position is consistent with the organization or individual you engage with**

*Select from:*

☒ Mixed

#### **(4.11.2.7) Indicate whether your organization attempted to influence the organization or individual's position in the reporting year**

*Select from:*

☒ No, we did not attempt to influence their position

#### **(4.11.2.8) Describe how your organization's position is consistent with or differs from the organization or individual's position, and any actions taken to influence their position**

*AGA's position on environment and climate change can be found on its website at <https://www.aga.org/policy/Environment/> AGA may participate in the political process, including participating in lobbying on issues related to climate. MGE does not attempt to control the political activity of AGA, and in fact, may sometimes disagree with political positions taken by AGA.*

#### **(4.11.2.9) Funding figure your organization provided to this organization or individual in the reporting year (currency)**

122000

#### **(4.11.2.10) Describe the aim of this funding and how it could influence policy, law or regulation that may impact the environment**

*This represents the membership dues for AGA.*

#### **(4.11.2.11) Indicate if you have evaluated whether your organization's engagement is aligned with global environmental treaties or policy goals**

*Select from:*

☒ No, we have not evaluated

#### **(4.12) Have you published information about your organization's response to environmental issues for this reporting year in places other than your CDP response?**

*Select from:*

☒ Yes

**(4.12.1) Provide details on the information published about your organization's response to environmental issues for this reporting year in places other than your CDP response. Please attach the publication.**

#### **Row 1**

##### **(4.12.1.1) Publication**

*Select from:*

☒ In voluntary sustainability reports

##### **(4.12.1.3) Environmental issues covered in publication**

*Select all that apply*

☒ Climate change

☒ Water

☒ Biodiversity

#### (4.12.1.4) Status of the publication

Select from:

☒ Underway - previous year attached

#### (4.12.1.5) Content elements

Select all that apply

- ☒ Governance
- ☒ Risks & Opportunities
- ☒ Strategy
- ☒ Emissions figures
- ☒ Emission targets

#### (4.12.1.6) Page/section reference

<https://www.mgeenergy.com/MGEEnergy/media/Library/documents/environmental-reports/2024-corporate-responsibility-sustainability-report-20250414.pdf>

#### (4.12.1.7) Attach the relevant publication

2024-corporate-responsibility-sustainability-report-20250414.pdf

#### (4.12.1.8) Comment

*Madison Gas and Electric (MGE) publishes an annual Corporate Responsibility and Sustainability Report to share matters of sustainability performance and interest with stakeholders. MGE is committed to helping customers, investors and other stakeholders better understand our strategies, risks, challenges, and opportunities as we transition to a more sustainable future. The report features information about MGE's corporate strategy and climate-related matters; safety and operations; metrics and targets; customer and employee engagement; risk management; and governance and oversight. MGE also continues to participate in EEL's ESG and sustainability reporting template. EEL, which represents all U.S. investor-owned electric companies, developed the voluntary, industry-specific template to provide more uniform and consistent reporting of data and information from the electric sector. The template includes data related to MGE's portfolio (generation and capacity), emissions, capital expenditures, human and natural resources, and other matters. The EEL disclosure information is available in MGE's online ESG Data Center, available at: <https://www.mge.com/sustainability/corporate-responsibility/esg-data-center>*

## C5. Business strategy

### (5.1) Does your organization use scenario analysis to identify environmental outcomes?

#### Climate change

##### (5.1.1) Use of scenario analysis

Select from:

☒ Yes

#### Water

##### (5.1.1) Use of scenario analysis

Select from:

☒ No, and we do not plan to within the next two years

##### (5.1.3) Primary reason why your organization has not used scenario analysis

Select from:

☒ Not an immediate strategic priority

### (5.1.1) Provide details of the scenarios used in your organization's scenario analysis.

#### Climate change

##### (5.1.1.1) Scenario used

Physical climate scenarios

☒ Customized publicly available climate physical scenario, please specify :The University of Wisconsin-Madison helped us compare our company's strategy to the 1.5 degree C scenarios in the IPCC SR15 Report.

### (5.1.1.3) Approach to scenario

Select from:

☒ Quantitative

### (5.1.1.4) Scenario coverage

Select from:

☒ Business division

### (5.1.1.6) Temperature alignment of scenario

Select from:

☒ 1.5°C or lower

### (5.1.1.8) Timeframes covered

Select all that apply

☒ 2050

### (5.1.1.9) Driving forces in scenario

Relevant technology and science

☒ Data regime (from closed to open)

### (5.1.1.10) Assumptions, uncertainties and constraints in scenario

*To evaluate what combination of energy and land-use policies could support the 1.5 degree C goal, multiple research groups around the world have developed computer models. These models attempt to project the global temperature response to different assumptions about energy technology and other factors over the next 100 years. The results of these computer models were reported in the SR15 report of the IPCC and shared through an online database managed by the Integrated Assessment Modeling Consortium (IAMC). The IAMC database provides researchers, companies, and the general public with information to support planning for a low-carbon future. The University of Wisconsin-Madison Nelson Institute for Environmental Studies and the Department of Atmospheric and Oceanic Sciences worked with MGE to evaluate the IPCC scenarios relevant to its operations. The IPCC database used in this study includes 414 scenarios of future energy use. The*

scenarios considered were those that had a temperature rise below 1.5 degrees or 1.5 degrees with low overshoot, in industrialized countries, and representing CO2 emissions from the electricity sector. Five scenarios met these requirements for inclusion in this analysis. The results of the analysis can be found in the report, "Interpreting Global Energy Scenarios for Emissions Planning at the Utility Scale" at <https://www.mge.com/net-zero-carbon-electricity/uw-madison-analysis-of-mge-s-net-zero-carbon-goal>

## **(5.1.2) Provide details of the outcomes of your organization's scenario analysis.**

### **Climate change**

#### **(5.1.2.1) Business processes influenced by your analysis of the reported scenarios**

*Select all that apply*

☒ Target setting and transition planning

#### **(5.1.2.2) Coverage of analysis**

*Select from:*

☒ Business division

#### **(5.1.2.3) Summarize the outcomes of the scenario analysis and any implications for other environmental issues**

*From the UW analysis report, "Interpreting Global Energy Scenarios for Emissions Planning at the Utility Scale," MGE's goal of 100% net-zero carbon emissions by 2050 is in line with these scenarios, and in fact, more aggressive than any of the five.*

## (5.2) Does your organization's strategy include a climate transition plan?

### (5.2.1) Transition plan

Select from:

☒ Yes, we have a climate transition plan which aligns with a 1.5°C world

### (5.2.3) Publicly available climate transition plan

Select from:

☒ Yes

### (5.2.4) Plan explicitly commits to cease all spending on, and revenue generation from, activities that contribute to fossil fuel expansion

Select from:

☒ No, and we do not plan to add an explicit commitment within the next two years

### (5.2.6) Explain why your organization does not explicitly commit to cease all spending on and revenue generation from activities that contribute to fossil fuel expansion

*The use of natural gas in our generation mix helps to maintain reliability, dispatchability and affordability with the planned retirement of coal-fired assets. As a dispatchable resource, highly efficient natural gas plants are an effective backup to renewable generation because they can be dispatched quickly and at times when it's more challenging for wind or solar generation, making it a dependable and cost-effective option for ensuring the Company has sufficient capacity to meet customers' needs and to maintain service reliability while enabling the Company's ongoing clean energy transition.*

### (5.2.7) Mechanism by which feedback is collected from shareholders on your climate transition plan

Select from:

☒ We have a different feedback mechanism in place



### **(5.2.8) Description of feedback mechanism**

*MGE has a link to our 1.5-degree analysis and climate transition strategy on our websites, mge.com and mgeenergy.com. The University of Wisconsin-Madison studied MGE's 2050 net-zero carbon electricity goal in its report, "Interpreting Global Energy Scenarios for Emissions Planning at the Utility Scale," published in fall 2020. This analysis supports that MGE's plan reflects carbon reductions consistent with limiting global warming to 1.5 degrees Celsius. Specific investor feedback occurs in many ways. MGE is a small, investor-owned utility. As Your Community Energy Company, our Officers and Directors are members of our community and generally available to the public. MGE Energy has a larger than typical number of retail shareowners. Those shareowners often communicate directly with our management, employees, Officers and Directors when out in our community attending local events, in local stores/restaurants, and other places. MGE also prioritizes regular engagement with institutional investor groups. MGE Officers also engage proactively at least twice a year with our largest institutional shareholders to obtain their feedback on our climate transition, and all shareholders are invited to ask questions during our Annual Shareholder meeting. MGE Energy's website has an email portal for investor questions to be addressed by the company. Investors also can provide feedback via either Investor Relations or to the Secretary of the Company at any time.*

### **(5.2.9) Frequency of feedback collection**

*Select from:*

☒ More frequently than annually

## **(5.3) Have environmental risks and opportunities affected your strategy and/or financial planning?**

### **(5.3.1) Environmental risks and/or opportunities have affected your strategy and/or financial planning**

*Select from:*

☒ Yes, both strategy and financial planning

### **(5.3.2) Business areas where environmental risks and/or opportunities have affected your strategy**

*Select all that apply*

☒ Products and services

☒ Operations

### (5.3.1) Describe where and how environmental risks and opportunities have affected your strategy.

#### Products and services

##### (5.3.1.1) Effect type

Select all that apply

- ☒ Risks
- ☒ Opportunities

##### (5.3.1.2) Environmental issues relevant to the risks and/or opportunities that have affected your strategy in this area

Select all that apply

- ☒ Climate change

##### (5.3.1.3) Describe how environmental risks and/or opportunities have affected your strategy in this area

*The products and services MGE provides to its customers are influenced by and part of our strategy for transitioning to a low- carbon future. MGE is working to achieve a more sustainable energy future by investing in cost-effective renewable generation and innovative new technologies and services to benefit all customers. MGE has emphasized this innovation by developing customer programs to address climate change and by partnering with our customers around clean energy, electric vehicles, and energy efficiency and conservation. Our Renewable Energy Rider and Shared Solar programs are two examples of programs that help to reduce MGE's carbon emissions while providing customers the option to grow their use of renewable energy as MGE works to decarbonize its energy supply for all customers. We also have been working on many fronts in the community to further the electrification of transportation (through EV charging at homes, workplaces and publicly accessible locations) and the practice of energy efficiency (through demand response programs and engagement efforts).*

#### Operations

##### (5.3.1.1) Effect type

Select all that apply

- ☒ Risks
- ☒ Opportunities

### (5.3.1.2) Environmental issues relevant to the risks and/or opportunities that have affected your strategy in this area

Select all that apply

☒ Climate change

### (5.3.1.3) Describe how environmental risks and/or opportunities have affected your strategy in this area

*Climate-related risks and opportunities influence our operations since MGE's carbon reduction path is based on our ongoing transition away from coal, the addition of new renewable generation and other decarbonization strategies (energy efficiency and electrification of transportation and other end uses) to achieve net-zero carbon electricity by 2050. MGE also is investing in our operations and infrastructure to enhance the electric distribution grid to support and to integrate new technology while ensuring safe, reliable and resilient service at reasonable cost. \*Language revised as of 12/2/25.*

### (5.3.2) Describe where and how environmental risks and opportunities have affected your financial planning.

#### Row 1

#### (5.3.2.1) Financial planning elements that have been affected

Select all that apply

☒ Assets

☒ Revenues

☒ Liabilities

☒ Direct costs

☒ Indirect costs

☒ Capital expenditures

#### (5.3.2.2) Effect type

Select all that apply

☒ Risks

☒ Opportunities

### (5.3.2.3) Environmental issues relevant to the risks and/or opportunities that have affected these financial planning elements

Select all that apply

☒ Climate change

### (5.3.2.4) Describe how environmental risks and/or opportunities have affected these financial planning elements

*Climate-related risks and opportunities are an inherent aspect of our financial planning. Our primary focus today and for the foreseeable future is our core utility customers at MGE as well as creating long-term value for our shareholders. MGE continues to face the challenge of providing its customers with reliable power at competitive prices. MGE works on meeting this challenge by investing in more efficient generation projects, including renewable energy sources. MGE has a market cap of approximately \$3.0 billion and has invested or has planned investments in clean energy projects of more than \$1.0 billion since 2015. MGE will continue to focus on growing earnings while managing operating and fuel costs. MGE's goal is to provide safe, reliable and efficient operations in addition to providing customer value. We believe it is critical to maintain a strong credit rating consistent with financial strength.*

### (5.4) In your organization's financial accounting, do you identify spending/revenue that is aligned with your organization's climate transition?

	Identification of spending/revenue that is aligned with your organization's climate transition	Methodology or framework used to assess alignment with your organization's climate transition
	Select from: <input checked="" type="checkbox"/> Yes	Select all that apply <input checked="" type="checkbox"/> Other methodology or framework

**(5.4.1) Quantify the amount and percentage share of your spending/revenue that is aligned with your organization’s climate transition.**

**Row 1**

**(5.4.1.5) Financial metric**

Select from:  
☒ CAPEX

**(5.4.1.12) Details of the methodology or framework used to assess alignment with your organization’s climate transition**

*MGE's actual capital expenditures for both 2023 and 2024, and forecasted capital expenditures for 2025 through 2029 can be found in the MGE Energy 2024 Form 10-k on pages 37 through 39. This includes expenditures on electric renewables that are currently under construction or pending regulatory approval. See <https://www.mgeenergy.com/MGEEnergy/media/Library/documents/sec-reports/sec-forms-10k-10q/20241231-10k.pdf>*

**(5.5) Does your organization invest in research and development (R&D) of low-carbon products or services related to your sector activities?**

	Investment in low-carbon R&D
	Select from: <input checked="" type="checkbox"/> No

## **(5.7) Break down, by source, your organization's CAPEX in the reporting year and CAPEX planned over the next 5 years.**

### **Coal – hard**

#### **(5.7.5) Explain your CAPEX calculations, including any assumptions**

*Planned CAPEX is over the next 5 years. Planned investments as transition away from coal. See 2024 MGE Energy, Inc. Form 10-K pages 37-39.*

### **Gas**

#### **(5.7.5) Explain your CAPEX calculations, including any assumptions**

*Planned CAPEX is over the next 5 years. Investments in new gas generation. See 2024 MGE Energy, Inc. Form 10-K pages 37-39.*

### **Wind**

#### **(5.7.5) Explain your CAPEX calculations, including any assumptions**

*Planned CAPEX is over the next 5 years. MGE is targeting net-zero carbon electricity by 2050. Solar, wind, and battery storage projects are a major step toward deep decarbonization and greater use of clean energy sources in pursuit of our goal. MGE continues to evaluate solar, wind, and battery storage projects that align with its goals. See 2024 MGE Energy, Inc. Form 10-K pages 37-39.*

### **Solar**

#### **(5.7.5) Explain your CAPEX calculations, including any assumptions**

*Planned CAPEX is over the next 5 years. MGE is targeting net-zero carbon electricity by 2050. Solar, wind, and battery storage projects are a major step toward deep decarbonization and greater use of clean energy sources in pursuit of our goal. MGE continues to evaluate solar, wind, and battery storage projects that align with its goals. See 2024 MGE Energy, Inc. Form 10-K pages 37-39.*

Other renewable (e.g. renewable hydrogen)

(5.7.5) Explain your CAPEX calculations, including any assumptions

Planned CAPEX is over the next 5 years. MGE is targeting net-zero carbon electricity by 2050. Solar, wind, and battery storage projects are a major step toward deep decarbonization and greater use of clean energy sources in pursuit of our goal. MGE continues to evaluate solar, wind, and battery storage projects that align with its goals. See 2024 MGE Energy, Inc. Form 10-K pages 37-39.

(5.7.1) Break down your total planned CAPEX in your current CAPEX plan for products and services (e.g. smart grids, digitalization, etc.).

Row 1

(5.7.1.1) Products and services

Select from:  
☒ Other, please specify :Enhanced Metering Solution

(5.7.1.2) Description of product/service

Investment in advanced metering infrastructure will provide customers with more timely and detailed energy use information, as well as outage and demand response and automated meter reading capabilities. See MGE Energy, Inc. 2024 Form 10-K pages 37-39 for information on forecasted capital expenditures.

(5.7.1.4) Percentage of total CAPEX planned for products and services

100

(5.7.1.5) End year of CAPEX plan

2029

## (5.10) Does your organization use an internal price on environmental externalities?

	Use of internal pricing of environmental externalities	Environmental externality priced
	Select from: <input checked="" type="checkbox"/> Yes	Select all that apply <input checked="" type="checkbox"/> Carbon

### (5.10.1) Provide details of your organization's internal price on carbon.

#### Row 1

#### (5.10.1.1) Type of pricing scheme

Select from:

☒ Other, please specify :Potential carbon restrictions

#### (5.10.1.2) Objectives for implementing internal price

Select all that apply

☒ Drive low-carbon investment

☒ Identify and seize low-carbon opportunities

☒ Other, please specify :Use an internal price for corporate engagement/stewardship purposes

#### (5.10.1.3) Factors considered when determining the price

Select all that apply

☒ Cost of required measures to achieve climate-related targets



#### (5.10.1.5) Scopes covered

*Select all that apply*

- ☒ Scope 1
- ☒ Scope 3, Category 3 - Fuel- and energy-related activities (not included in Scope 1 or 2)

#### (5.10.1.6) Pricing approach used – spatial variance

*Select from:*

- ☒ Uniform

#### (5.10.1.8) Pricing approach used – temporal variance

*Select from:*

- ☒ Evolutionary

#### (5.10.1.9) Indicate how you expect the price to change over time

*Resource planning is a dynamic process so the potential carbon restrictions considered therein will also vary with the project economics and conditions.*

#### (5.10.1.12) Business decision-making processes the internal price is applied to

*Select all that apply*

- ☒ Capital expenditure
- ☒ Operations
- ☒ Risk management
- ☒ Opportunity management
- ☒ Public policy engagement

#### (5.10.1.13) Internal price is mandatory within business decision-making processes

*Select from:*

- ☒ No

### (5.10.1.15) Pricing approach is monitored and evaluated to achieve objectives

Select from:

☒ Yes

### (5.10.1.16) Details of how the pricing approach is monitored and evaluated to achieve your objectives

*When making generation decisions, MGE engages in extensive resource planning analysis and modeling which consider many factors, including forecasted energy use projections; long-term impacts on customers, investors, and the environment; potential future environmental regulations; assumptions related to the anticipated costs of fuel and many other factors related to energy production. Our economic analysis explicitly includes possible projected carbon emissions limits to help ensure our decisions are financially sound—regardless of whether or how carbon is regulated in the future.*

### (5.11) Do you engage with your value chain on environmental issues?

	Engaging with this stakeholder on environmental issues	Environmental issues covered
Suppliers	Select from: <input checked="" type="checkbox"/> Yes	Select all that apply <input checked="" type="checkbox"/> Climate change
Customers	Select from: <input checked="" type="checkbox"/> Yes	Select all that apply <input checked="" type="checkbox"/> Climate change <input checked="" type="checkbox"/> Water
Investors and shareholders	Select from: <input checked="" type="checkbox"/> Yes	Select all that apply <input checked="" type="checkbox"/> Climate change
Other value chain stakeholders	Select from: <input checked="" type="checkbox"/> Yes	Select all that apply <input checked="" type="checkbox"/> Climate change

### (5.11.5) Do your suppliers have to meet environmental requirements as part of your organization's purchasing process?

	Suppliers have to meet specific environmental requirements related to this environmental issue as part of the purchasing process
Climate change	Select from: <input checked="" type="checkbox"/> No, and we do not plan to introduce environmental requirements related to this environmental issue within the next two years

### (5.11.7) Provide further details of your organization's supplier engagement on environmental issues.

#### Climate change

#### (5.11.7.2) Action driven by supplier engagement

Select from:

☒ Emissions reduction

#### (5.11.7.3) Type and details of engagement

Information collection

☒ Collect GHG emissions data at least annually from suppliers

#### (5.11.7.4) Upstream value chain coverage

Select all that apply

☒ Tier 1 suppliers

#### (5.11.7.5) % of tier 1 suppliers by procurement spend covered by engagement

Select from:

☒ 1-25%

#### (5.11.7.9) Describe the engagement and explain the effect of your engagement on the selected environmental action

*MGE annually calculates its emissions from its energy supply mix in its value chain, which provides electric service to its customers. Carbon dioxide (CO2) emissions are calculated from generating units owned by MGE, power purchase agreements and power purchased by MGE on the regional Midcontinent Independent System Operator (MISO) market. The market purchase emission rate is based on a seven-state regional average CO2 emission profile from all power produced in Wisconsin and the surrounding Midwest states. Engagement with our purchase power suppliers helps to inform and to measure our GHG inventory and the progress in achieving the company's carbon reduction goal of net-zero carbon electricity by 2050.*

### Climate change

#### (5.11.7.2) Action driven by supplier engagement

Select from:

☒ Emissions reduction

#### (5.11.7.3) Type and details of engagement

Information collection

☒ Collect GHG emissions data at least annually from suppliers

#### (5.11.7.4) Upstream value chain coverage

Select all that apply

☒ Tier 1 suppliers

#### (5.11.7.5) % of tier 1 suppliers by procurement spend covered by engagement

Select from:

☒ 26-50%

### **(5.11.7.9) Describe the engagement and explain the effect of your engagement on the selected environmental action**

*MGE works with our natural gas suppliers and pipeline operators to estimate emissions in our value chain and to ensure we are serving our customers with cost-effective, environmentally responsible sources of natural gas. MGE contracts with two natural gas transmission companies, Northern Natural Gas, a Berkshire Hathaway Energy Pipeline Group Company, and ANR Pipeline Company, owned by TC Energy. Both of these companies, as part of their sustainability commitments, are part of the ONE Future Coalition. ONE Future is the trade name for “Our Nation’s Energy Future Coalition, Inc.,” which is a voluntary group of companies working together to reduce methane emissions across the natural gas supply chain to 1% or less by 2025. In its 2024 report, ONE Future cited a methane intensity of less than one-half of one percent, beating its 1% goal for the seventh year in a row. See <https://onefuture.us/annual-report/#current>. Northern Natural Gas and ANR Pipeline Company also are part of the U.S. Environmental Protection Agency’s Methane Challenge Program. Partners in this voluntary program report systemic and comprehensive actions to reduce methane emissions as part of efforts to enhance transparency in the industry. Engagement with our natural gas suppliers helps to inform and to measure our GHG inventory and the progress to minimize overall GHG emissions inventory.*

### **(5.11.9) Provide details of any environmental engagement activity with other stakeholders in the value chain.**

#### **Climate change**

#### **(5.11.9.1) Type of stakeholder**

Select from:

☒ Customers

#### **(5.11.9.2) Type and details of engagement**

Education/Information sharing

☒ Run an engagement campaign to educate stakeholders about the environmental impacts about your products, goods and/or services

#### **(5.11.9.3) % of stakeholder type engaged**

Select from:

☒ 100%

### (5.11.9.5) Rationale for engaging these stakeholders and scope of engagement

*Energy efficiency is one of MGE's key strategies for achieving deep decarbonization. Through the use of new technologies, hands-on workshops, energy education (tools and resources), conservation kits and innovative rate options, MGE engages customers to help them take control of their energy use. Engaging and educating our residential and commercial and industrial customers around energy efficiency helps to reduce the amount of electric generation needed and the associated GHG emissions. Engaging with a diverse customer base requires a diverse set of strategies to achieve the company's energy goals. MGE has communications tools (bill inserts, video, websites, newsletters, email marketing, social media, Home Energy Line, advertising, events) as well as programs, products and services (MGE Connect, MyMeter, Charge Ahead, partnership with Focus on Energy, etc.) to advance this key decarbonization strategy. Using a variety of channels, MGE provides culturally and linguistically relevant information, materials, workshops and presentations. We serve customers who come to us for information as well as take information into the community through workshops and other events for direct engagement. MGE's Home Energy Line and Ask the Experts email address to "ask the experts" are efficient ways for residential customers to get energy tips and answers to their energy-related questions via phone or email. MGE also maintains a separate line for commercial and industrial customers who need assistance. MGE also partners with community organizations and works with community media to reach targeted and underserved customers to share and to promote our programs, products and services, resources and tools. In addition, MGE partners with schools and youth-oriented organizations to educate the next generation of consumers about using energy wisely (and safely).*

### (5.11.9.6) Effect of engagement and measures of success

*MGE teams engage in many different ways to reach the company's diverse customer base. One of those ways is through live segments on a local Spanish language radio station. MGE team members cover energy efficiency and conservation, electrification, payment options and safety. Social media is one of the communications vehicles used to share information about energy efficiency and conservation. In addition, MGE engages vulnerable customers through the distribution of energy-saving LED light bulbs and energy resource materials through community partners in targeted geographic areas with high concentrations of low-income families. Focus on Energy, Wisconsin's statewide energy efficiency and renewable resource program, is MGE's partner in energy efficiency and conservation. In 2024, MGE business customers who participated in Focus on Energy programs saved more than 4,400 kilowatts (kW); about 24,153,000 kilowatt-hours (kWh); and 1,257,000 therms. They received nearly \$3,442,682 in incentives for completing conservation projects. Residential customers saved nearly 2,100 kW; more than 10,703,000 kWh; and approximately 1,169,000 therms. They received more than \$3,430,000 in incentives for completing conservation projects.*

## Climate change

### (5.11.9.1) Type of stakeholder

Select from:

☒ Customers

### (5.11.9.2) Type and details of engagement

Innovation and collaboration

☒ Collaborate with stakeholders on innovations to reduce environmental impacts in products and services

#### (5.11.9.5) Rationale for engaging these stakeholders and scope of engagement

*MGE Connect is a demand response program from MGE. Energy efficiency is a key decarbonization strategy. Electric use peaks during stretches of hot, humid weather when air conditioners run in a majority of households and businesses, putting pressure on the electric grid and generation resources. With MGE Connect®, MGE is able to manage participating air conditioners to reduce energy use during periods of high demand, helping to manage both demand on our distribution grid and long-term costs to customers. In summer 2024, MGE Connect helped us reduce peak usage by an average of 6 megawatts per event during a number of days with high demand. In 2024, MGE expanded the MGE Connect program to include small business customers and controlled water heating options, and it also allows for non-summer events to manage demand throughout the year in anticipation of electrification increasing electric demand for space and water heating.*

#### (5.11.9.6) Effect of engagement and measures of success

*In summer 2024, MGE Connect helped us reduce peak usage by an average of 6 megawatts per event during a number of days with high demand. In 2024, MGE expanded the MGE Connect program to include small business customers and controlled water heating options, and it also allows for non-summer events to manage demand throughout the year in anticipation of electrification increasing electric demand for space and water heating.*

### Climate change

#### (5.11.9.1) Type of stakeholder

Select from:

☒ Customers

#### (5.11.9.2) Type and details of engagement

Innovation and collaboration

☒ Collaborate with stakeholders on innovations to reduce environmental impacts in products and services

#### (5.11.9.5) Rationale for engaging these stakeholders and scope of engagement

*Residential Battery Storage In late 2020, MGE launched a technology demonstration project featuring battery storage in partnership with several residential electric customers who have solar photovoltaic systems. The homeowner's rooftop solar system charges the battery, which is used during times of peak demand and as a backup source of power for the household. This project helps MGE understand how batteries operate in Wisconsin temperatures and how batteries could help control long-term costs by managing our collective use of energy.*

#### (5.11.9.6) Effect of engagement and measures of success

*This program is in its infancy and four customers are currently engaged.*

### Climate change

#### (5.11.9.1) Type of stakeholder

Select from:

☒ Customers

#### (5.11.9.2) Type and details of engagement

Innovation and collaboration

☒ Collaborate with stakeholders on innovations to reduce environmental impacts in products and services

#### (5.11.9.5) Rationale for engaging these stakeholders and scope of engagement

*Charge Ahead The electrification of transportation is one of MGE's key strategies for deep decarbonization. MGE launched the Charge Ahead demonstration project for electric vehicles (EVs) in March 2021. This program gives eligible EV drivers the opportunity to test new technology for MGE to manage EV charging. The partnership with customers helps MGE explore ways to meet the needs of EV drivers into the future while planning for the impact of EVs on our distribution grid. A software platform is used to manage charging through the vehicles' on-board communications systems. Charge Ahead customers provide a need-by time for their vehicle and enable smart charging. The software then optimizes charging. In the program's inaugural year, participating customers were assigned to one of three groups that allowed MGE to shift 80% of charging to off-peak times or curtail charging during peak times. The opportunity to shift EV charging to lower-cost times and to periods when renewable generation is most productive will help us prepare for more EV charging on our distribution grid. Managed charging also serves to benefit all MGE customers by reducing the need for electrical system upgrades and new generation facilities long term. As more drivers opt for EVs, MGE's ability to work with customers to manage charging becomes increasingly important.*

#### (5.11.9.6) Effect of engagement and measures of success

*In 2024, more than 150 customers were enrolled in Charge Ahead.*



## Climate change

### (5.11.9.1) Type of stakeholder

Select from:

☒ Customers

### (5.11.9.2) Type and details of engagement

Innovation and collaboration

☒ Collaborate with stakeholders on innovations to reduce environmental impacts in products and services

### (5.11.9.5) Rationale for engaging these stakeholders and scope of engagement

*MyMeter Energy Dashboard MGE's commercial customers have access to MGE's MyMeter energy dashboard, formerly known as MGE's On Demand Savings (ODS) program. MyMeter allows customers to track their energy usage daily, set threshold alerts and energy markers and to benchmark their facilities. MyMeter provides electric and natural gas monthly billing and cost data; enables automated benchmarking services to allow commercial property owners to benchmark their buildings using ENERGY STAR® Portfolio Manager; and, allows users to set monthly energy challenge goals. MyMeter builds upon the success of MGE's ODS program, which offered large customers tools and strategies to reduce their energy use, especially during periods when demand for electricity is at its peak. ODS used an online dashboard to give customers near real-time energy usage information, enabling them to act to cut costs and to reduce their environmental footprint. The ODS program was recognized in 2018 with an Inspiring Efficiency Award for Innovation by the Midwest Energy Efficiency Alliance, a regional organization dedicated to advancing energy-efficient technologies, products and best practices.*

### (5.11.9.6) Effect of engagement and measures of success

*A 2021 third-party evaluation of the On Demand Savings (ODS) program, which preceded MGE's MyMeter Energy Dashboard, revealed high levels of customer satisfaction. The evaluators found an average demand reduction of 3.3% across all participating sites and a 4% reduction in energy use.*

## Climate change

### (5.11.9.1) Type of stakeholder

Select from:

☒ Customers

### (5.11.9.2) Type and details of engagement

Innovation and collaboration

☒ Other innovation and collaboration, please specify :Renewable Flat Bill Pilot

### (5.11.9.5) Rationale for engaging these stakeholders and scope of engagement

*MGE's Renewable Flat Bill program offers eligible residential electric customers the opportunity to sign up for a fixed monthly electric bill based on their expected usage. Qualified participants receive 100% renewable energy with a monthly fixed bill for 12 months. The pilot program utilizes MGE's Green Power Tomorrow (GPT) program. Each kilowatt-hour (kWh) of electricity that is purchased by customers participating in GPT will be from renewable energy resources in our area, including wind farms and solar arrays. Those purchased kWh include the environmental benefits, or Renewable Energy Certificates, which are retired on behalf of the customer.*

### (5.11.9.6) Effect of engagement and measures of success

*Participation in the pilot in 2023 varied from 10 to 13 customers throughout the year. MGE has approval to increase the participation limit to 200 participants.*

## Climate change

### (5.11.9.1) Type of stakeholder

Select from:

☒ Customers

### (5.11.9.2) Type and details of engagement

Innovation and collaboration

☒ Other innovation and collaboration, please specify :Shared Solar

### (5.11.9.5) Rationale for engaging these stakeholders and scope of engagement

*MGE works with customers to grow the company's use of clean energy. MGE's community solar program, Shared Solar, offers customers locally generated solar energy at minimal upfront cost. Shared Solar gives residential and small business customers the option to power their household or business with local solar for up to half of their annual energy use. Shared Solar participants lock in electricity rates to help protect against increases over time. Also, Shared Solar supports local*

renewable energy to reduce the customer's carbon footprint and helps MGE to achieve net-zero carbon electricity. It offers an easy and affordable way for customers to support locally generated clean energy.

#### (5.11.9.6) Effect of engagement and measures of success

MGE's Shared Solar program has about 2,000 customers enrolled and an active waiting list of customers seeking participation. In 2024, MGE filed an application with State regulators seeking approval of a new community solar program largely based on Shared Solar. Shared Solar II would offer participants the option to pay a minimal up-front fee to subscribe to receive energy from a local solar array for six years as the company continues to work toward net-zero carbon emissions. The proposal includes an option that would make participation in the program easier for lower income customers who receive energy assistance. Under the proposed low-income option, eligible customers would pay a smaller up-front participation fee to reserve shares and a lower energy rate to participate. This energy rate also would be fixed for the duration of the six-year agreement. \*Language revised as of 12/2/25.

### Climate change

#### (5.11.9.1) Type of stakeholder

Select from:

☒ Customers

#### (5.11.9.2) Type and details of engagement

Innovation and collaboration

☒ Other innovation and collaboration, please specify :Renewable Energy Rider

#### (5.11.9.5) Rationale for engaging these stakeholders and scope of engagement

MGE's Renewable Energy Rider program gives MGE and larger commercial/business customers who seek customized renewable energy solutions the opportunity to partner to grow locally generated renewable energy. The program is designed to meet the needs and goals of companies that support or have signed on to the Corporate Renewable Energy Buyers' Principles, a collaboration facilitated by the World Resources Institute and the World Wildlife Fund. This service from MGE can provide renewable energy to power all or a portion of a business. MGE is the first utility in Wisconsin to offer this opportunity.

#### (5.11.9.6) Effect of engagement and measures of success

To date, MGE is partnering with the following customers through RER agreements: University of Wisconsin-Madison, State of Wisconsin Department of Administration, City of Fitchburg, Placon, Promega Corporation, Tribe 9 Foods, Willy Street Co-op, City of Middleton, Middleton-Cross Plains Area School District, City of Madison, Madison Metropolitan School District and Dane County. MGE has built more than 40 MW of solar capacity under RER agreements.

## Climate change

### (5.11.9.1) Type of stakeholder

Select from:

☒ Customers

### (5.11.9.2) Type and details of engagement

Innovation and collaboration

☒ Other innovation and collaboration, please specify :Green Power Tomorrow

### (5.11.9.5) Rationale for engaging these stakeholders and scope of engagement

*MGE's Green Power Tomorrow (GPT) is the company's green pricing program. At a penny more per kilowatt-hour (kWh), GPT is a convenient and effective way for customers to support local and regional renewable energy from MGE and offset their greenhouse gas emissions. The GPT program is served by MGE's wind and solar resources in the region. In 2024, MGE expanded the program to include a Renewable Natural Gas (RNG) pilot option to offer customers the ability to reduce their carbon impacts for their natural gas usage.*

### (5.11.9.6) Effect of engagement and measures of success

*Approximately 10,000 MGE electric customers are enrolled in GPT; these customers support green power that's generated in our region.*

## Climate change

### (5.11.9.1) Type of stakeholder

Select from:

☒ Customers

### (5.11.9.2) Type and details of engagement

Innovation and collaboration

☒ Other innovation and collaboration, please specify :Community Shared Decarbonization Goals

#### (5.11.9.5) Rationale for engaging these stakeholders and scope of engagement

*MGE has ongoing collaborations with a number of communities it serves, including the cities of Fitchburg, Madison and Middleton. These partnerships serve to advance shared goals around renewable energy, electric vehicles (EVs), and energy efficiency and conservation. MGE is a longtime partner of Sustain Dane, a local organization that has offered innovative programs for local residents and businesses for 25 years. During this time, Sustain Dane has been recognized as a leader in helping local organizations set and achieve sustainability goals. MGE and the City of Madison have partnered with Sustain Dane to host Accelerate Sustainability Workshops, which help local professionals learn more about sustainability best practices through local case studies. MGE also has served as a member of the Dane County Council on Climate Change, which included local government, businesses, utilities and environmental organizations. MGE's partnership with local stakeholders through the council offered another opportunity to work toward common goals, including deep decarbonization. As MGE advances electrification as a decarbonization strategy, MGE works with customers, stakeholders such as municipalities and school districts, and other community partners to grow the use of electric vehicles (EVs) and to facilitate charging options throughout its service territory. MGE also helps to educate customers, businesses and communities at-large about the benefits of EVs. MGE experts have been and continue to be on hand at many community events with a variety of EVs to share information on driving and charging EVs. For example, each year, MGE sponsors an EV Expo in Madison to share information about EVs and EV charging.*

#### (5.11.9.6) Effect of engagement and measures of success

*The impact of our collaborations with municipalities and businesses and other community partners is detailed in our annual Corporate Responsibility and Sustainability Report at [mge.com/environment](https://mge.com/environment). We continue to build on these collaborations in many different ways. For example, the Connected Communities project is a Department of Energy-funded collaboration between MGE, the City of Madison and others to advance the adoption of Grid Interactive Energy Efficient Buildings (GEBs). The first phase of the project will include a GEB installation on a selection of City of Madison facilities. The second phase will take the knowledge learned in the demonstration phase to create an MGE GEBs Pilot Program.*

### Climate change

#### (5.11.9.1) Type of stakeholder

Select from:

☒ Customers

#### (5.11.9.2) Type and details of engagement

Innovation and collaboration

☒ Other innovation and collaboration, please specify :Charge@Home

#### (5.11.9.5) Rationale for engaging these stakeholders and scope of engagement

*Transportation is the leading contributor of greenhouse gas emissions in the U.S. The electrification of transportation is a key strategy for reducing carbon emissions. MGE is working with customers, stakeholders, municipalities and other community partners to grow the use of EVs and to facilitate charging options throughout our community, including at home, at work and on the go. MGE's public charging network is powered by 100% renewable energy. Charge@Home is MGE's home charging program. With Charge@Home, MGE owns, maintains and coordinates the installation of Level 2 charging stations at customers' homes. The program gives MGE the ability to study drivers' charging habits and to explore remote management of charging sessions to better understand the potential impact of EVs on the grid, including how grid management can help to lower costs for all MGE customers by optimizing our use of generation resources. MGE also helps area employers of all sizes and multifamily developers who want to offer employees and residents charging, and MGE works with businesses interested in transitioning their fleets to EVs. We discuss options with customers and help them navigate the decision-making and implementation process.*

#### (5.11.9.6) Effect of engagement and measures of success

*At close of 2024, more than 250 customers were participating in Charge@Home.*

### Climate change

#### (5.11.9.1) Type of stakeholder

Select from:

☒ Customers

#### (5.11.9.2) Type and details of engagement

Education/Information sharing

☒ Share information on environmental initiatives, progress and achievements

#### (5.11.9.5) Rationale for engaging these stakeholders and scope of engagement

*The MGE Energy and MGE Boards of Directors believe that understanding and considering shareholder perspectives advances accountability and transparency. Our investor relations efforts also help executive management and the board understand how investors view the company's policies, practices, strategies and long-term direction and help leadership assess and address investors' emerging areas of interest, such as topics related to environmental, social and governance matters.*

#### **(5.11.9.6) Effect of engagement and measures of success**

*Officers engage shareholders in several ways, including through discussions with a number of our institutional shareholders; presentations at industry conferences and investor meetings; meetings with analysts and investment firms; our Annual Meeting of shareholders; and inquiries taken through the company's investor site, board emails and in-house Shareholder Services staff. These efforts are in addition to the company's regular and ongoing investor relations engagement.*

## C6. Environmental Performance - Consolidation Approach

(6.1) Provide details on your chosen consolidation approach for the calculation of environmental performance data.

	Consolidation approach used
Climate change	<i>Select from:</i> <input checked="" type="checkbox"/> Equity share
Water	<i>Select from:</i> <input checked="" type="checkbox"/> Equity share
Biodiversity	<i>Select from:</i> <input checked="" type="checkbox"/> Operational control



## C7. Environmental performance - Climate Change

### (7.1) Is this your first year of reporting emissions data to CDP?

Select from:

☒ No

#### (7.1.1) Has your organization undergone any structural changes in the reporting year, or are any previous structural changes being accounted for in this disclosure of emissions data?

	Has there been a structural change?
	Select all that apply <input checked="" type="checkbox"/> No

#### (7.1.2) Has your emissions accounting methodology, boundary, and/or reporting year definition changed in the reporting year?

	Change(s) in methodology, boundary, and/or reporting year definition?
	Select all that apply <input checked="" type="checkbox"/> No

**(7.2) Select the name of the standard, protocol, or methodology you have used to collect activity data and calculate emissions.**

Select all that apply

- ☒ The Greenhouse Gas Protocol: Scope 2 Guidance
- ☒ US EPA Mandatory Greenhouse Gas Reporting Rule
- ☒ US EPA Emissions & Generation Resource Integrated Database (eGRID)
- ☒ The Greenhouse Gas Protocol: Corporate Value Chain (Scope 3) Standard
- ☒ The Greenhouse Gas Protocol: A Corporate Accounting and Reporting Standard (Revised Edition)
- ☒ US EPA Center for Corporate Climate Leadership: Indirect Emissions From Purchased Electricity
- ☒ US EPA Center for Corporate Climate Leadership: Direct Emissions from Mobile Combustion Sources
- ☒ US EPA Center for Corporate Climate Leadership: Direct Emissions from Stationary Combustion Sources
- ☒ US EPA Center for Corporate Climate Leadership: Direct Fugitive Emissions from Refrigeration, Air Conditioning, Fire Suppression, and Industrial Gases

**(7.3) Describe your organization’s approach to reporting Scope 2 emissions.**

	Scope 2, location-based	Scope 2, market-based
	Select from: <input checked="" type="checkbox"/> We are reporting a Scope 2, location-based figure	Select from: <input checked="" type="checkbox"/> We are reporting a Scope 2, market-based figure

**(7.4) Are there any sources (e.g. facilities, specific GHGs, activities, geographies, etc.) of Scope 1, Scope 2 or Scope 3 emissions that are within your selected reporting boundary which are not included in your disclosure?**

Select from:

- ☒ No

## **(7.5) Provide your base year and base year emissions.**

### **Scope 1**

#### **(7.5.1) Base year end**

12/31/2014

#### **(7.5.2) Base year emissions (metric tons CO2e)**

1803960

#### **(7.5.3) Methodological details**

*Includes estimated emissions from owned electricity generation, facility fuel usage, fleet fuel usage, and refrigerant losses.*

### **Scope 2 (location-based)**

#### **(7.5.1) Base year end**

12/31/2014

#### **(7.5.2) Base year emissions (metric tons CO2e)**

21452

#### **(7.5.3) Methodological details**

*Emissions are from estimated distribution line losses associated with purchased power.*

### **Scope 3 category 3: Fuel-and-energy-related activities (not included in Scope 1 or 2)**

#### **(7.5.1) Base year end**

12/31/2014

## **(7.5.2) Base year emissions (metric tons CO2e)**

791926

## **(7.5.3) Methodological details**

*Includes emissions from purchased power for resale calculated using a regional emission factor.*

## **Scope 3 category 11: Use of sold products**

## **(7.5.1) Base year end**

12/31/2014

## **(7.5.2) Base year emissions (metric tons CO2e)**

1309834.2

## **(7.5.3) Methodological details**

*As reported and following the requirements and methods of 40 CFR Part 98, Subpart NN. MGE reports the potential CO2 quantities associated with natural gas received by end-users that receive less than 460,000 thousand standard cubic feet of natural gas per year at a single meter.*

## **(7.6) What were your organization's gross global Scope 1 emissions in metric tons CO2e?**

## **Reporting year**

## **(7.6.1) Gross global Scope 1 emissions (metric tons CO2e)**

1723138

## **(7.6.3) Methodological details**

*Scope 1 emissions from 2024 include company-owned fossil fuel electricity generation, other fossil fuel-fired equipment at company facilities, fleet vehicles, refrigerant losses, and natural gas distribution system losses.*

## **(7.7) What were your organization's gross global Scope 2 emissions in metric tons CO2e?**

### **Reporting year**

#### **(7.7.1) Gross global Scope 2, location-based emissions (metric tons CO2e)**

3965

#### **(7.7.2) Gross global Scope 2, market-based emissions (metric tons CO2e)**

3965

#### **(7.7.4) Methodological details**

*Emissions are from estimated distribution line losses associated with purchased power and based on the line loss percentage provided by the local Transmission Company, ATC.*

## **(7.8) Account for your organization's gross global Scope 3 emissions, disclosing and explaining any exclusions.**

### **Purchased goods and services**

#### **(7.8.1) Evaluation status**

*Select from:*

☒ Relevant, not yet calculated

#### **(7.8.5) Please explain**

*Data and systems to track this information and estimate this category of Scope 3 emissions are not yet in place.*

## Capital goods

### (7.8.1) Evaluation status

Select from:

☒ Relevant, not yet calculated

### (7.8.5) Please explain

*Data and systems to track this information and estimate this category of Scope 3 emissions are not yet in place.*

## Fuel-and-energy-related activities (not included in Scope 1 or 2)

### (7.8.1) Evaluation status

Select from:

☒ Relevant, calculated

### (7.8.2) Emissions in reporting year (metric tons CO<sub>2</sub>e)

350991

### (7.8.3) Emissions calculation methodology

Select all that apply

☒ Hybrid method

### (7.8.4) Percentage of emissions calculated using data obtained from suppliers or value chain partners

7

### (7.8.5) Please explain

*Category 3 includes emissions from purchased power sold to end users, and upstream emissions from purchased natural gas. For energy market purchases from the Midcontinent Independent System Operator (MISO), an emission rate is used that reflects regional average data from 7 states: Wisconsin, Minnesota, Illinois, Iowa,*

Missouri, Indiana, and Michigan. For non-emitting renewable energy sources, including wind and solar, there are zero emissions. The regional average rates are determined using the latest actual generation data from the U.S. Energy Information Administration (EIA). Upstream emissions from purchased natural gas are calculated using an average production loss based on the review of several peer reviewed studies and represent emissions from natural gas upstream of the MGE distribution system.

## Upstream transportation and distribution

### (7.8.1) Evaluation status

Select from:

☒ Relevant, not yet calculated

### (7.8.5) Please explain

MGE is in the process of evaluating potential methods for calculating emissions from this Scope 3 category.

## Waste generated in operations

### (7.8.1) Evaluation status

Select from:

☒ Relevant, not yet calculated

### (7.8.5) Please explain

Data and systems to track this information and estimate this category of Scope 3 emissions are not yet in place.

## Business travel

### (7.8.1) Evaluation status

Select from:

☒ Relevant, not yet calculated

### (7.8.5) Please explain

*Data and systems to track this information and estimate this category of Scope 3 emissions are not yet in place.*

## Employee commuting

### (7.8.1) Evaluation status

*Select from:*

☒ Relevant, not yet calculated

### (7.8.5) Please explain

*Data and systems to track this information and estimate this category of Scope 3 emissions are not yet in place.*

## Upstream leased assets

### (7.8.1) Evaluation status

*Select from:*

☒ Not relevant, explanation provided

### (7.8.5) Please explain

*Not applicable.*

## Downstream transportation and distribution

### (7.8.1) Evaluation status

*Select from:*

☒ Not relevant, explanation provided



### (7.8.5) Please explain

*Not applicable.*

## Processing of sold products

### (7.8.1) Evaluation status

*Select from:*

☒ Not relevant, explanation provided

### (7.8.5) Please explain

*Not applicable.*

## Use of sold products

### (7.8.1) Evaluation status

*Select from:*

☒ Relevant, calculated

### (7.8.2) Emissions in reporting year (metric tons CO<sub>2</sub>e)

1344506

### (7.8.3) Emissions calculation methodology

*Select all that apply*

☒ Other, please specify :Methodology from 40 CFR 98, Subpart NN

### (7.8.5) Please explain

*As reported and following the requirements and methods of 40 CFR Part 98, Subpart NN. MGE reports the potential CO2 quantities associated with natural gas received by end-users that receive less than 460,000 thousand standard cubic feet of natural gas per year at a single meter. The emissions represent all natural gas received by MGE customers.*

## End of life treatment of sold products

### (7.8.1) Evaluation status

Select from:

☒ Not relevant, explanation provided

### (7.8.5) Please explain

*Electricity and natural gas products do not have a conventional useful life.*

## Downstream leased assets

### (7.8.1) Evaluation status

Select from:

☒ Not relevant, explanation provided

### (7.8.5) Please explain

*Not applicable.*

## Franchises

### (7.8.1) Evaluation status

Select from:

☒ Not relevant, explanation provided

### **(7.8.5) Please explain**

*Not applicable.*

## **Investments**

### **(7.8.1) Evaluation status**

*Select from:*

☒ Relevant, not yet calculated

### **(7.8.5) Please explain**

*Data and systems to track this information and estimate this category of Scope 3 emissions are not yet in place.*

## **Other (upstream)**

### **(7.8.1) Evaluation status**

*Select from:*

☒ Not evaluated

## **Other (downstream)**

### **(7.8.1) Evaluation status**

*Select from:*

☒ Not evaluated

**(7.9) Indicate the verification/assurance status that applies to your reported emissions.**

	Verification/assurance status
Scope 1	<i>Select from:</i> <input checked="" type="checkbox"/> Third-party verification or assurance process in place
Scope 2 (location-based or market-based)	<i>Select from:</i> <input checked="" type="checkbox"/> No third-party verification or assurance
Scope 3	<i>Select from:</i> <input checked="" type="checkbox"/> No third-party verification or assurance

**(7.9.1) Provide further details of the verification/assurance undertaken for your Scope 1 emissions, and attach the relevant statements.**

**Row 1**

**(7.9.1.1) Verification or assurance cycle in place**

*Select from:*

☒ Annual process

**(7.9.1.2) Status in the current reporting year**

*Select from:*

☒ Complete

### (7.9.1.3) Type of verification or assurance

Select from:

☒ Not applicable

### (7.9.1.6) Relevant standard

Select from:

☒ Other, please specify :Scope 1 GHG emissions are calculated by direct measurement of CO2 emissions using a 40 CFR, Part 75 certified CEMS or by using default CO2 emission factors and applying that carbon content to the amount of fuel burned during the reporting year.

### (7.9.1.7) Proportion of reported emissions verified (%)

99

## (7.10) How do your gross global emissions (Scope 1 and 2 combined) for the reporting year compare to those of the previous reporting year?

Select from:

☒ Increased

**(7.10.1) Identify the reasons for any change in your gross global emissions (Scope 1 and 2 combined), and for each of them specify how your emissions compare to the previous year.**

### Change in output

### (7.10.1.1) Change in emissions (metric tons CO2e)

83242

### (7.10.1.2) Direction of change in emissions

Select from:

☒ Increased

### (7.10.1.3) Emissions value (percentage)

5

### (7.10.1.4) Please explain calculation

*The primary reason for an increase in Scope 1 and Scope 2 emissions from 2023 to 2024 was due to an increase in fossil fuel-fired electrical generation of about 9% due to increased demand. Dispatch of MGE's electric generation units is dependent on energy demand as determined by the Midcontinent Independent System Operator (MISO) energy markets. Other sources of Scope 1 and Scope 2 emissions had negligible differences from 2023 to 2024 but were overall slightly lower.*

### (7.10.2) Are your emissions performance calculations in 7.10 and 7.10.1 based on a location-based Scope 2 emissions figure or a market-based Scope 2 emissions figure?

Select from:

☒ Market-based

### (7.12) Are carbon dioxide emissions from biogenic carbon relevant to your organization?

Select from:

☒ No

### (7.15) Does your organization break down its Scope 1 emissions by greenhouse gas type?

Select from:

☒ Yes

**(7.15.1) Break down your total gross global Scope 1 emissions by greenhouse gas type and provide the source of each used global warming potential (GWP).**

**Row 1**

**(7.15.1.1) Greenhouse gas**

Select from:

☒ CO2

**(7.15.1.2) Scope 1 emissions (metric tons of CO2e)**

1697175

**(7.15.1.3) GWP Reference**

Select from:

☒ IPCC Sixth Assessment Report (AR6 - 100 year)

**Row 2**

**(7.15.1.1) Greenhouse gas**

Select from:

☒ CH4

**(7.15.1.2) Scope 1 emissions (metric tons of CO2e)**

18209

**(7.15.1.3) GWP Reference**

Select from:

☒ IPCC Sixth Assessment Report (AR6 - 100 year)

### Row 3

#### (7.15.1.1) Greenhouse gas

Select from:

☒ N2O

#### (7.15.1.2) Scope 1 emissions (metric tons of CO2e)

7367

#### (7.15.1.3) GWP Reference

Select from:

☒ IPCC Sixth Assessment Report (AR6 - 100 year)

### Row 4

#### (7.15.1.1) Greenhouse gas

Select from:

☒ SF6

#### (7.15.1.2) Scope 1 emissions (metric tons of CO2e)

33

#### (7.15.1.3) GWP Reference

Select from:

☒ IPCC Sixth Assessment Report (AR6 - 100 year)



**(7.15.3) Break down your total gross global Scope 1 emissions from electric utilities value chain activities by greenhouse gas type.**

**Fugitives**

**(7.15.3.1) Gross Scope 1 CO2 emissions (metric tons CO2)**

18

**(7.15.3.2) Gross Scope 1 methane emissions (metric tons CH4)**

590

**(7.15.3.3) Gross Scope 1 SF6 emissions (metric tons SF6)**

0.001

**(7.15.3.4) Total gross Scope 1 emissions (metric tons CO2e)**

17619

**(7.15.3.5) Comment**

*Fugitives include natural gas system and SF6 losses.*

**Combustion (Electric utilities)**

**(7.15.3.1) Gross Scope 1 CO2 emissions (metric tons CO2)**

1691473

**(7.15.3.2) Gross Scope 1 methane emissions (metric tons CH4)**

21

#### (7.15.3.4) Total gross Scope 1 emissions (metric tons CO2e)

1699457

#### (7.15.3.5) Comment

*Combustion (Electric utilities) includes emissions from fossil fuel electricity generation.*

#### Combustion (Other)

#### (7.15.3.1) Gross Scope 1 CO2 emissions (metric tons CO2)

5684

#### (7.15.3.2) Gross Scope 1 methane emissions (metric tons CH4)

0.3

#### (7.15.3.4) Total gross Scope 1 emissions (metric tons CO2e)

5708

#### (7.15.3.5) Comment

*Combustion (other) includes emissions from fuel use at MGE facilities and mobile sources.*

#### Emissions not elsewhere classified

#### (7.15.3.4) Total gross Scope 1 emissions (metric tons CO2e)

354

#### (7.15.3.5) Comment

*Emissions not elsewhere classified includes refrigeration system losses.*

**(7.16) Break down your total gross global Scope 1 and 2 emissions by country/area.**

	Scope 1 emissions (metric tons CO2e)	Scope 2, location-based (metric tons CO2e)	Scope 2, market-based (metric tons CO2e)
United States of America	1723138	3965	3965

**(7.17) Indicate which gross global Scope 1 emissions breakdowns you are able to provide.**

Select all that apply

☒ By activity

**(7.17.3) Break down your total gross global Scope 1 emissions by business activity.**

	Activity	Scope 1 emissions (metric tons CO2e)
Row 1	Electricity generation	1699457
Row 2	Other stationary combustion	3868
Row 3	Mobile source combustion	1839
Row 4	Natural gas distribution system losses	17586
Row 5	Refrigerant losses	354
Row 6	SF6 Losses	33

**(7.19) Break down your organization's total gross global Scope 1 emissions by sector production activity in metric tons CO2e.**

	Gross Scope 1 emissions, metric tons CO2e	Comment
Electric utility activities	1699457	<i>This amount represents CO2e from electricity generation by company-owned facilities.</i>

**(7.20) Indicate which gross global Scope 2 emissions breakdowns you are able to provide.**

Select all that apply

☒ By activity

**(7.20.3) Break down your total gross global Scope 2 emissions by business activity.**

	Activity	Scope 2, location-based (metric tons CO2e)	Scope 2, market-based (metric tons CO2e)
Row 1	<i>Line losses associated with purchased power.</i>	3965	3965

**(7.22) Break down your gross Scope 1 and Scope 2 emissions between your consolidated accounting group and other entities included in your response.**

**Consolidated accounting group**

**(7.22.1) Scope 1 emissions (metric tons CO2e)**

1723138

**(7.22.2) Scope 2, location-based emissions (metric tons CO2e)**

3965

**(7.22.3) Scope 2, market-based emissions (metric tons CO2e)**

3965

**(7.22.4) Please explain**

*All MGE Scope 1 and Scope 2 emissions reported are included within the consolidated accounting group.*

**All other entities**

**(7.22.1) Scope 1 emissions (metric tons CO2e)**

0

**(7.22.2) Scope 2, location-based emissions (metric tons CO2e)**

0

**(7.22.3) Scope 2, market-based emissions (metric tons CO2e)**

0

#### (7.22.4) Please explain

*There are no other entities to report.*

#### (7.23) Is your organization able to break down your emissions data for any of the subsidiaries included in your CDP response?

*Select from:*

☒ Not relevant as we do not have any subsidiaries

#### (7.30) Select which energy-related activities your organization has undertaken.

	Indicate whether your organization undertook this energy-related activity in the reporting year
Consumption of fuel (excluding feedstocks)	<i>Select from:</i> <input checked="" type="checkbox"/> Yes
Consumption of purchased or acquired electricity	<i>Select from:</i> <input checked="" type="checkbox"/> Yes
Consumption of purchased or acquired heat	<i>Select from:</i> <input checked="" type="checkbox"/> No
Consumption of purchased or acquired steam	<i>Select from:</i> <input checked="" type="checkbox"/> No
Consumption of purchased or acquired cooling	<i>Select from:</i> <input checked="" type="checkbox"/> No
Generation of electricity, heat, steam, or cooling	<i>Select from:</i> <input checked="" type="checkbox"/> Yes

**(7.30.1) Report your organization's energy consumption totals (excluding feedstocks) in MWh.**

**Consumption of fuel (excluding feedstock)**

**(7.30.1.1) Heating value**

Select from:

☒ HHV (higher heating value)

**(7.30.1.2) MWh from renewable sources**

0

**(7.30.1.3) MWh from non-renewable sources**

6303323

**(7.30.1.4) Total (renewable + non-renewable) MWh**

6303323.00

**Consumption of purchased or acquired electricity**

**(7.30.1.2) MWh from renewable sources**

0

**(7.30.1.3) MWh from non-renewable sources**

3430

**(7.30.1.4) Total (renewable + non-renewable) MWh**

3430.00

Consumption of self-generated non-fuel renewable energy

(7.30.1.2) MWh from renewable sources

61

(7.30.1.4) Total (renewable + non-renewable) MWh

61.00

Total energy consumption

(7.30.1.2) MWh from renewable sources

61

(7.30.1.3) MWh from non-renewable sources

6306753

(7.30.1.4) Total (renewable + non-renewable) MWh

6306814.00

(7.30.6) Select the applications of your organization’s consumption of fuel.

	Indicate whether your organization undertakes this fuel application
Consumption of fuel for the generation of electricity	Select from: <input checked="" type="checkbox"/> Yes



	Indicate whether your organization undertakes this fuel application
Consumption of fuel for the generation of heat	<i>Select from:</i> <input checked="" type="checkbox"/> Yes
Consumption of fuel for the generation of steam	<i>Select from:</i> <input checked="" type="checkbox"/> No
Consumption of fuel for the generation of cooling	<i>Select from:</i> <input checked="" type="checkbox"/> No
Consumption of fuel for co-generation or tri-generation	<i>Select from:</i> <input checked="" type="checkbox"/> Yes

**(7.30.7) State how much fuel in MWh your organization has consumed (excluding feedstocks) by fuel type.**

#### **Sustainable biomass**

##### **(7.30.7.2) Total fuel MWh consumed by the organization**

0

##### **(7.30.7.3) MWh fuel consumed for self-generation of electricity**

0

##### **(7.30.7.4) MWh fuel consumed for self-generation of heat**

0

**(7.30.7.7) MWh fuel consumed for self- cogeneration or self-trigeneration**

0

**Other biomass**

**(7.30.7.2) Total fuel MWh consumed by the organization**

0

**(7.30.7.3) MWh fuel consumed for self-generation of electricity**

0

**(7.30.7.4) MWh fuel consumed for self-generation of heat**

0

**(7.30.7.7) MWh fuel consumed for self- cogeneration or self-trigeneration**

0

**Other renewable fuels (e.g. renewable hydrogen)**

**(7.30.7.2) Total fuel MWh consumed by the organization**

0

**(7.30.7.3) MWh fuel consumed for self-generation of electricity**

0

**(7.30.7.4) MWh fuel consumed for self-generation of heat**

0

**(7.30.7.7) MWh fuel consumed for self- cogeneration or self-trigeneration**

0

**Coal**

**(7.30.7.1) Heating value**

Select from:

☒ HHV

**(7.30.7.2) Total fuel MWh consumed by the organization**

4374038

**(7.30.7.3) MWh fuel consumed for self-generation of electricity**

4374038

**(7.30.7.4) MWh fuel consumed for self-generation of heat**

0

**(7.30.7.7) MWh fuel consumed for self- cogeneration or self-trigeneration**

0

**Oil**

**(7.30.7.1) Heating value**

Select from:

☒ HHV

#### (7.30.7.2) Total fuel MWh consumed by the organization

3343

#### (7.30.7.3) MWh fuel consumed for self-generation of electricity

1862

#### (7.30.7.4) MWh fuel consumed for self-generation of heat

25

#### (7.30.7.7) MWh fuel consumed for self- cogeneration or self-trigeneration

1456

### Gas

#### (7.30.7.1) Heating value

Select from:

☒ HHV

#### (7.30.7.2) Total fuel MWh consumed by the organization

1924437

#### (7.30.7.3) MWh fuel consumed for self-generation of electricity

954843

#### (7.30.7.4) MWh fuel consumed for self-generation of heat

21879

**(7.30.7.7) MWh fuel consumed for self- cogeneration or self-trigeneration**

947715

**Other non-renewable fuels (e.g. non-renewable hydrogen)**

**(7.30.7.2) Total fuel MWh consumed by the organization**

0

**(7.30.7.3) MWh fuel consumed for self-generation of electricity**

0

**(7.30.7.4) MWh fuel consumed for self-generation of heat**

0

**(7.30.7.7) MWh fuel consumed for self- cogeneration or self-trigeneration**

0

**Total fuel**

**(7.30.7.1) Heating value**

Select from:

☒ HHV

**(7.30.7.2) Total fuel MWh consumed by the organization**

6301817

**(7.30.7.3) MWh fuel consumed for self-generation of electricity**

5330742

#### (7.30.7.4) MWh fuel consumed for self-generation of heat

21904

#### (7.30.7.7) MWh fuel consumed for self- cogeneration or self-trigeneration

949171

**(7.30.14) Provide details on the electricity, heat, steam, and/or cooling amounts that were accounted for at a zero or near-zero emission factor in the market-based Scope 2 figure reported in 7.7.**

#### Row 1

##### (7.30.14.1) Country/area

Select from:

☒ United States of America

##### (7.30.14.2) Sourcing method

Select from:

☒ Other, please specify :MGE does not include energy from zero emission PPA purchases in its Scope 2 estimates.

##### (7.30.14.10) Comment

*MGE's market-based Scope 2 emissions are based on line losses from purchased electricity for resale. The line loss percentage is applied to the estimated emissions from purchased power and does not include zero emission sources.*

**(7.30.16) Provide a breakdown by country/area of your electricity/heat/steam/cooling consumption in the reporting year.**

**United States of America**

**(7.30.16.1) Consumption of purchased electricity (MWh)**

0

**(7.30.16.2) Consumption of self-generated electricity (MWh)**

3727

**(7.30.16.4) Consumption of purchased heat, steam, and cooling (MWh)**

0

**(7.30.16.5) Consumption of self-generated heat, steam, and cooling (MWh)**

74758

**(7.30.16.6) Total electricity/heat/steam/cooling energy consumption (MWh)**

78485.00

**(7.33) Does your electric utility organization have a transmission and distribution business?**

Select from:

☒ Yes

**(7.33.1) Disclose the following information about your transmission and distribution business.**

**Row 1**

**(7.33.1.1) Country/area/region**

*Select from:*

☒ United States of America

**(7.33.1.2) Voltage level**

*Select from:*

☒ Distribution (low voltage)

**(7.33.1.3) Annual load (GWh)**

3485

**(7.33.1.4) Annual energy losses (% of annual load)**

1.98

**(7.33.1.5) Scope where emissions from energy losses are accounted for**

*Select from:*

☒ Scope 2 (location-based)

**(7.33.1.6) Emissions from energy losses (metric tons CO<sub>2</sub>e)**

3965

**(7.33.1.7) Length of network (km)**

3515



#### (7.33.1.9) Area covered (km2)

684

#### (7.33.1.10) Comment

*Scope 2 emissions from energy losses are from purchased power only. Emissions from energy losses from electricity generated and distributed by MGE-owned facilities are already accounted for in Scope 1 emissions.*

**(7.45) Describe your gross global combined Scope 1 and 2 emissions for the reporting year in metric tons CO2e per unit currency total revenue and provide any additional intensity metrics that are appropriate to your business operations.**

**Row 1**

#### (7.45.1) Intensity figure

0.0026

#### (7.45.2) Metric numerator (Gross global combined Scope 1 and 2 emissions, metric tons CO2e)

1727103

#### (7.45.3) Metric denominator

Select from:

☒ unit total revenue

#### (7.45.4) Metric denominator: Unit total

676944000

#### (7.45.5) Scope 2 figure used

Select from:

☒ Location-based

#### (7.45.6) % change from previous year

6

#### (7.45.7) Direction of change

Select from:

☒ Increased

#### (7.45.8) Reasons for change

Select all that apply

☒ Change in output

#### (7.45.9) Please explain

*The primary reason for an increase in Scope 1 and Scope 2 emissions from 2023 to 2024 was due to an increase in fossil fuel-fired electrical generation of about 9% due to increased demand. Dispatch of MGE's electric generation units is dependent on energy demand as determined by the Midcontinent Independent System Operator (MISO) energy markets. Other sources of Scope 1 and Scope 2 emissions had negligible differences from 2023 to 2024 but were overall slightly lower.*

### Row 2

#### (7.45.1) Intensity figure

0.6

#### (7.45.2) Metric numerator (Gross global combined Scope 1 and 2 emissions, metric tons CO2e)

1727103

### (7.45.3) Metric denominator

Select from:

☒ megawatt hour generated (MWh)

### (7.45.4) Metric denominator: Unit total

2900163

### (7.45.5) Scope 2 figure used

Select from:

☒ Location-based

### (7.45.6) % change from previous year

7

### (7.45.7) Direction of change

Select from:

☒ Decreased

### (7.45.8) Reasons for change

Select all that apply

☒ Other emissions reduction activities

### (7.45.9) Please explain

*Although overall total emissions were higher due to increased demand in 2024, MGE's Scope 1 and Scope 2 emission intensity on a MWh generated basis decreased by about 7% from 2023 to 2024. This is primarily due to an increase in owned renewable generation, paired with a decrease in power purchased from the market.*

**(7.46) For your electric utility activities, provide a breakdown of your Scope 1 emissions and emissions intensity relating to your total power plant capacity and generation during the reporting year by source.**

	Absolute scope 1 emissions (metric tons CO2e)	Emissions intensity based on gross or net electricity generation	Scope 1 emissions intensity (Net generation)
Coal – hard	1419810	Select from: <input checked="" type="checkbox"/> Net	977.70
Oil	474	Select from: <input checked="" type="checkbox"/> Net	948.00
Gas	271553	Select from: <input checked="" type="checkbox"/> Net	414.96
Wind	0	Select from: <input checked="" type="checkbox"/> Net	0.00
Solar	0	Select from: <input checked="" type="checkbox"/> Net	0.00
Total	1691837	Select from: <input checked="" type="checkbox"/> Net	583.35

**(7.53) Did you have an emissions target that was active in the reporting year?**

Select all that apply

☒ Absolute target

## (7.53.1) Provide details of your absolute emissions targets and progress made against those targets.

### Row 1

#### (7.53.1.1) Target reference number

Select from:

☒ Abs 1

#### (7.53.1.2) Is this a science-based target?

Select from:

☒ No, but we are reporting another target that is science-based

#### (7.53.1.5) Date target was set

01/01/2005

#### (7.53.1.6) Target coverage

Select from:

☒ Business activity

#### (7.53.1.7) Greenhouse gases covered by target

Select all that apply

☒ Carbon dioxide (CO2)

#### (7.53.1.8) Scopes

Select all that apply

☒ Scope 1

☒ Scope 3

### **(7.53.1.10) Scope 3 categories**

*Select all that apply*

☒ Scope 3, Category 3 – Fuel- and energy- related activities (not included in Scope 1 or 2)

### **(7.53.1.11) End date of base year**

12/31/2005

### **(7.53.1.12) Base year Scope 1 emissions covered by target (metric tons CO2e)**

2308469

### **(7.53.1.16) Base year Scope 3, Category 3: Fuel-and-energy-related activities (not included in Scopes 1 or 2) emissions covered by target (metric tons CO2e)**

912517

### **(7.53.1.31) Base year total Scope 3 emissions covered by target (metric tons CO2e)**

912517.000

### **(7.53.1.32) Total base year emissions covered by target in all selected Scopes (metric tons CO2e)**

3220986.000

### **(7.53.1.55) Targeted reduction from base year (%)**

20

### **(7.53.1.56) Total emissions at end date of target covered by target in all selected Scopes (metric tons CO2e)**

2576788.800

#### (7.53.1.57) Scope 1 emissions in reporting year covered by target (metric tons CO2e)

1691835

#### (7.53.1.61) Scope 3, Category 3: Fuel-and-energy-related activities (not included in Scopes 1 or 2) emissions in reporting year covered by target (metric tons CO2e)

200253

#### (7.53.1.76) Total Scope 3 emissions in reporting year covered by target (metric tons CO2e)

200253.000

#### (7.53.1.77) Total emissions in reporting year covered by target in all selected scopes (metric tons CO2e)

1892088.000

#### (7.53.1.78) Land-related emissions covered by target

Select from:

☒ No, it does not cover any land-related emissions (e.g. non-FLAG SBT)

#### (7.53.1.79) % of target achieved relative to base year

206.29

#### (7.53.1.80) Target status in reporting year

Select from:

☒ Achieved

#### (7.53.1.82) Explain target coverage and identify any exclusions

*In 2005, MGE set a goal to reduce CO2 emissions from electric energy supplied to customers by at least 20% by 2015. Our decarbonization goals for electricity supplied to our customers include emissions from our owned generation (Scope 1) and purchased generation (Scope 3). We include this previously achieved target to demonstrate MGE's commitment to GHG emissions reductions and to illustrate the company's approach to goal setting. Our carbon reduction goals are consistent*

with climate science and signal the company's direction but do not determine its pace in working to achieve decarbonization as quickly and cost-effectively as possible.

#### (7.53.1.86) List the emissions reduction initiatives which contributed most to achieving this target

In 2011, MGE discontinued burning coal at the Blount Generating Station as part of its previous long-term framework called Energy 2015. In addition to discontinuing the use of coal at Blount, under Energy 2015, MGE increased its energy from renewable resources by almost 12 times between 2005 and 2015 in order to achieve the 20% goal. MGE is targeting net-zero carbon electricity by 2050.

#### Row 2

#### (7.53.1.1) Target reference number

Select from:

☒ Abs 2

#### (7.53.1.2) Is this a science-based target?

Select from:

☒ No, but we are reporting another target that is science-based

#### (7.53.1.5) Date target was set

01/01/2015

#### (7.53.1.6) Target coverage

Select from:

☒ Business activity

#### (7.53.1.7) Greenhouse gases covered by target

Select all that apply

☒ Carbon dioxide (CO2)



### (7.53.1.8) Scopes

*Select all that apply*

- ☒ Scope 1
- ☒ Scope 3

### (7.53.1.10) Scope 3 categories

*Select all that apply*

- ☒ Scope 3, Category 3 – Fuel- and energy- related activities (not included in Scope 1 or 2)

### (7.53.1.11) End date of base year

12/31/2005

### (7.53.1.12) Base year Scope 1 emissions covered by target (metric tons CO2e)

2308469

### (7.53.1.16) Base year Scope 3, Category 3: Fuel-and-energy-related activities (not included in Scopes 1 or 2) emissions covered by target (metric tons CO2e)

912517

### (7.53.1.31) Base year total Scope 3 emissions covered by target (metric tons CO2e)

912517.000

### (7.53.1.32) Total base year emissions covered by target in all selected Scopes (metric tons CO2e)

3220986.000

### (7.53.1.54) End date of target

12/31/2030

**(7.53.1.55) Targeted reduction from base year (%)**

40

**(7.53.1.56) Total emissions at end date of target covered by target in all selected Scopes (metric tons CO2e)**

1932591.600

**(7.53.1.57) Scope 1 emissions in reporting year covered by target (metric tons CO2e)**

1691835

**(7.53.1.61) Scope 3, Category 3: Fuel-and-energy-related activities (not included in Scopes 1 or 2) emissions in reporting year covered by target (metric tons CO2e)**

334490

**(7.53.1.76) Total Scope 3 emissions in reporting year covered by target (metric tons CO2e)**

334490.000

**(7.53.1.77) Total emissions in reporting year covered by target in all selected scopes (metric tons CO2e)**

2026325.000

**(7.53.1.78) Land-related emissions covered by target**

Select from:

☒ No, it does not cover any land-related emissions (e.g. non-FLAG SBT)

**(7.53.1.79) % of target achieved relative to base year**

92.72

### (7.53.1.80) Target status in reporting year

Select from:

☒ Replaced

### (7.53.1.81) Explain the reasons for the revision, replacement, or retirement of the target

*This target has since been replaced twice by a new goal to reduce carbon emissions from the energy supplied to customers.*

### (7.53.1.82) Explain target coverage and identify any exclusions

*Under our Energy 2030 framework for a more sustainable future, introduced in November 2015, MGE committed to reducing carbon emissions from the energy supplied to customers by at least 40% by 2030 (from 2005 levels). This target has since been replaced twice by a new goal to reduce carbon emissions from the energy supplied to customers. Our decarbonization goals for electricity supplied to our customers include emissions from our owned generation (Scope 1) and purchased generation (Scope 3). MGE is targeting net-zero carbon electricity by 2050.*

## Row 3

### (7.53.1.1) Target reference number

Select from:

☒ Abs 3

### (7.53.1.2) Is this a science-based target?

Select from:

☒ No, but we are reporting another target that is science-based

### (7.53.1.5) Date target was set

01/01/2020

#### (7.53.1.6) Target coverage

Select from:

☒ Business activity

#### (7.53.1.7) Greenhouse gases covered by target

Select all that apply

☒ Carbon dioxide (CO2)

#### (7.53.1.8) Scopes

Select all that apply

☒ Scope 1

☒ Scope 3

#### (7.53.1.10) Scope 3 categories

Select all that apply

☒ Scope 3, Category 3 – Fuel- and energy- related activities (not included in Scope 1 or 2)

#### (7.53.1.11) End date of base year

12/31/2005

#### (7.53.1.12) Base year Scope 1 emissions covered by target (metric tons CO2e)

2308469

#### (7.53.1.16) Base year Scope 3, Category 3: Fuel-and-energy-related activities (not included in Scopes 1 or 2) emissions covered by target (metric tons CO2e)

912517

**(7.53.1.31) Base year total Scope 3 emissions covered by target (metric tons CO2e)**

912517.000

**(7.53.1.32) Total base year emissions covered by target in all selected Scopes (metric tons CO2e)**

3220986.000

**(7.53.1.54) End date of target**

12/31/2030

**(7.53.1.55) Targeted reduction from base year (%)**

65

**(7.53.1.56) Total emissions at end date of target covered by target in all selected Scopes (metric tons CO2e)**

1127345.100

**(7.53.1.57) Scope 1 emissions in reporting year covered by target (metric tons CO2e)**

1691835

**(7.53.1.61) Scope 3, Category 3: Fuel-and-energy-related activities (not included in Scopes 1 or 2) emissions in reporting year covered by target (metric tons CO2e)**

334490

**(7.53.1.76) Total Scope 3 emissions in reporting year covered by target (metric tons CO2e)**

334490.000

**(7.53.1.77) Total emissions in reporting year covered by target in all selected scopes (metric tons CO2e)**

2026325.000

#### (7.53.1.78) Land-related emissions covered by target

Select from:

☒ No, it does not cover any land-related emissions (e.g. non-FLAG SBT)

#### (7.53.1.79) % of target achieved relative to base year

57.06

#### (7.53.1.80) Target status in reporting year

Select from:

☒ Replaced

#### (7.53.1.81) Explain the reasons for the revision, replacement, or retirement of the target

*This target has since been replaced by a new goal to reduce carbon emissions from the energy supplied to customers.*

#### (7.53.1.82) Explain target coverage and identify any exclusions

*Under our Energy 2030 framework for a more sustainable future, introduced in November 2015, MGE committed to reducing carbon emissions from the energy supplied to customers by at least 40% by 2030. This target has since been replaced by a new goal to reduce carbon emissions from the energy supplied to customers. Our decarbonization goals for electricity supplied to our customers include emissions from our owned generation (Scope 1) and purchased generation (Scope 3). MGE is targeting net-zero carbon electricity by 2050.*

### Row 4

#### (7.53.1.1) Target reference number

Select from:

☒ Abs 4

### (7.53.1.2) Is this a science-based target?

Select from:

- ☒ Yes, we consider this a science-based target, but we have not committed to seek validation of this target by the Science Based Targets initiative within the next two years

### (7.53.1.4) Target ambition

Select from:

- ☒ 1.5°C aligned

### (7.53.1.5) Date target was set

01/01/2019

### (7.53.1.6) Target coverage

Select from:

- ☒ Business activity

### (7.53.1.7) Greenhouse gases covered by target

Select all that apply

- ☒ Carbon dioxide (CO2)

### (7.53.1.8) Scopes

Select all that apply

- ☒ Scope 1  
☒ Scope 3

### **(7.53.1.10) Scope 3 categories**

*Select all that apply*

☒ Scope 3, Category 3 – Fuel- and energy- related activities (not included in Scope 1 or 2)

### **(7.53.1.11) End date of base year**

12/31/2005

### **(7.53.1.12) Base year Scope 1 emissions covered by target (metric tons CO2e)**

2308469

### **(7.53.1.16) Base year Scope 3, Category 3: Fuel-and-energy-related activities (not included in Scopes 1 or 2) emissions covered by target (metric tons CO2e)**

912517

### **(7.53.1.31) Base year total Scope 3 emissions covered by target (metric tons CO2e)**

912517.000

### **(7.53.1.32) Total base year emissions covered by target in all selected Scopes (metric tons CO2e)**

3220986.000

### **(7.53.1.54) End date of target**

12/31/2050

### **(7.53.1.55) Targeted reduction from base year (%)**

100



**(7.53.1.56) Total emissions at end date of target covered by target in all selected Scopes (metric tons CO2e)**

0.000

**(7.53.1.57) Scope 1 emissions in reporting year covered by target (metric tons CO2e)**

1691835

**(7.53.1.61) Scope 3, Category 3: Fuel-and-energy-related activities (not included in Scopes 1 or 2) emissions in reporting year covered by target (metric tons CO2e)**

334490

**(7.53.1.76) Total Scope 3 emissions in reporting year covered by target (metric tons CO2e)**

334490.000

**(7.53.1.77) Total emissions in reporting year covered by target in all selected scopes (metric tons CO2e)**

2026325.000

**(7.53.1.78) Land-related emissions covered by target**

Select from:

☒ No, it does not cover any land-related emissions (e.g. non-FLAG SBT)

**(7.53.1.79) % of target achieved relative to base year**

37.09

**(7.53.1.80) Target status in reporting year**

Select from:

☒ Underway

## (7.53.1.82) Explain target coverage and identify any exclusions

*In May 2019, MGE announced a goal of net-zero carbon electricity by 2050, which aligns with the Intergovernmental Panel on Climate Change (IPCC) and its assessment of limiting global temperature increases to 1.5 degrees Celsius. In 2019, MGE began working with the University of Wisconsin-Madison's Nelson Institute for Environmental Studies to evaluate the company's goal of net-zero carbon electricity by 2050. The analysis was done within the context of the October 2018 special report on global warming of 1.5 degrees Celsius by the IPCC. Models were used to analyze MGE's goal, and suggested that by 2050, emissions from electricity generation in industrialized countries should be 87% to 99% lower than the 2005 baseline. MGE's plan for net-zero carbon emissions by 2050 is a 100% reduction from 2005 levels and reflects carbon reductions consistent with limiting global warming to 1.5 degrees Celsius. Our decarbonization goals for electricity supplied to our customers include emissions from our owned generation (Scope 1) and purchased generation (Scope 3). We believe this is a science-based target based on the University of Wisconsin-Madison Nelson Institute for Environmental Studies and the Department of Atmospheric and Oceanic Sciences study. See <https://www.mge.com/net-zero-carbon-electricity/uw-madison-analysis-of-mge-s-net-zero-carbon-goal>*

## (7.53.1.84) Plan for achieving target, and progress made to the end of the reporting year

*MGE's solar, wind, and battery storage projects are a major step toward deep decarbonization and greater use of clean energy sources in pursuit of MGE's net-zero carbon electricity goal. Additionally, MGE continues its work to help customers with energy efficiency and electrification, including the electrification of transportation.*

### Row 5

## (7.53.1.1) Target reference number

Select from:

☒ Abs 5

## (7.53.1.2) Is this a science-based target?

Select from:

☒ Yes, we consider this a science-based target, but we have not committed to seek validation of this target by the Science Based Targets initiative within the next two years

## (7.53.1.4) Target ambition

Select from:

☒ 1.5°C aligned

#### (7.53.1.5) Date target was set

01/01/2020

#### (7.53.1.6) Target coverage

Select from:

☒ Business activity

#### (7.53.1.7) Greenhouse gases covered by target

Select all that apply

☒ Carbon dioxide (CO2)

#### (7.53.1.8) Scopes

Select all that apply

☒ Scope 1

☒ Scope 3

#### (7.53.1.10) Scope 3 categories

Select all that apply

☒ Scope 3, Category 3 – Fuel- and energy- related activities (not included in Scope 1 or 2)

#### (7.53.1.11) End date of base year

12/31/2005

#### (7.53.1.12) Base year Scope 1 emissions covered by target (metric tons CO2e)

2308469

**(7.53.1.16) Base year Scope 3, Category 3: Fuel-and-energy-related activities (not included in Scopes 1 or 2) emissions covered by target (metric tons CO2e)**

912517

**(7.53.1.31) Base year total Scope 3 emissions covered by target (metric tons CO2e)**

912517.000

**(7.53.1.32) Total base year emissions covered by target in all selected Scopes (metric tons CO2e)**

3220986.000

**(7.53.1.54) End date of target**

12/31/2030

**(7.53.1.55) Targeted reduction from base year (%)**

80

**(7.53.1.56) Total emissions at end date of target covered by target in all selected Scopes (metric tons CO2e)**

644197.200

**(7.53.1.57) Scope 1 emissions in reporting year covered by target (metric tons CO2e)**

1691835

**(7.53.1.61) Scope 3, Category 3: Fuel-and-energy-related activities (not included in Scopes 1 or 2) emissions in reporting year covered by target (metric tons CO2e)**

334490

#### (7.53.1.76) Total Scope 3 emissions in reporting year covered by target (metric tons CO2e)

334490.000

#### (7.53.1.77) Total emissions in reporting year covered by target in all selected scopes (metric tons CO2e)

2026325.000

#### (7.53.1.78) Land-related emissions covered by target

Select from:

☒ No, it does not cover any land-related emissions (e.g. non-FLAG SBT)

#### (7.53.1.79) % of target achieved relative to base year

46.36

#### (7.53.1.80) Target status in reporting year

Select from:

☒ Underway

#### (7.53.1.82) Explain target coverage and identify any exclusions

*Our decarbonization goals for electricity supplied to our customers include emissions from our owned generation (Scope 1) and purchased generation (Scope 3). We believe this is a science-based target based on the University of Wisconsin-Madison Nelson Institute for Environmental Studies and the Department of Atmospheric and Oceanic Sciences study described further in Section C3 of this CDP report. In this work, IPCC scenarios relevant to its operations and targets were evaluated. See <https://www.mge.com/net-zero-carbon-electricity/uw-madison-analysis-of-mge-s-net-zero-carbon-goal>*

#### (7.53.1.84) Plan for achieving target, and progress made to the end of the reporting year

*MGE's solar, wind, and battery storage projects are a major step toward deep decarbonization and greater use of clean energy sources in pursuit of MGE's net-zero carbon electricity goal. Additionally, MGE continues its work to help customers with energy efficiency and electrification, including the electrification of transportation.*

## Row 6

### (7.53.1.1) Target reference number

Select from:

☒ Abs 6

### (7.53.1.2) Is this a science-based target?

Select from:

☒ No, but we are reporting another target that is science-based

### (7.53.1.5) Date target was set

01/01/2018

### (7.53.1.6) Target coverage

Select from:

☒ Business activity

### (7.53.1.7) Greenhouse gases covered by target

Select all that apply

☒ Carbon dioxide (CO2)

### (7.53.1.8) Scopes

Select all that apply

☒ Scope 1

☒ Scope 3

### **(7.53.1.10) Scope 3 categories**

*Select all that apply*

☒ Scope 3, Category 3 – Fuel- and energy- related activities (not included in Scope 1 or 2)

### **(7.53.1.11) End date of base year**

12/31/2005

### **(7.53.1.12) Base year Scope 1 emissions covered by target (metric tons CO2e)**

2308469

### **(7.53.1.16) Base year Scope 3, Category 3: Fuel-and-energy-related activities (not included in Scopes 1 or 2) emissions covered by target (metric tons CO2e)**

912517

### **(7.53.1.31) Base year total Scope 3 emissions covered by target (metric tons CO2e)**

912517.000

### **(7.53.1.32) Total base year emissions covered by target in all selected Scopes (metric tons CO2e)**

3220986.000

### **(7.53.1.54) End date of target**

12/31/2050

### **(7.53.1.55) Targeted reduction from base year (%)**

80

**(7.53.1.56) Total emissions at end date of target covered by target in all selected Scopes (metric tons CO2e)**

644197.200

**(7.53.1.57) Scope 1 emissions in reporting year covered by target (metric tons CO2e)**

1691835

**(7.53.1.61) Scope 3, Category 3: Fuel-and-energy-related activities (not included in Scopes 1 or 2) emissions in reporting year covered by target (metric tons CO2e)**

334490

**(7.53.1.76) Total Scope 3 emissions in reporting year covered by target (metric tons CO2e)**

334490.000

**(7.53.1.77) Total emissions in reporting year covered by target in all selected scopes (metric tons CO2e)**

2026325.000

**(7.53.1.78) Land-related emissions covered by target**

Select from:

☒ No, it does not cover any land-related emissions (e.g. non-FLAG SBT)

**(7.53.1.79) % of target achieved relative to base year**

46.36

**(7.53.1.80) Target status in reporting year**

Select from:

☒ Replaced



### (7.53.1.81) Explain the reasons for the revision, replacement, or retirement of the target

*This target has been replaced by our 2050 goal of net-zero carbon electricity.*

### (7.53.1.82) Explain target coverage and identify any exclusions

*In 2018, MGE committed to reducing carbon dioxide emissions by at least 80% by 2050 to be consistent with the U.S. Mid-Century Strategy (MCS) for Deep Decarbonization. That goal was replaced in 2019 with the target of net-zero carbon electricity by 2050.*

### (7.54) Did you have any other climate-related targets that were active in the reporting year?

*Select all that apply*

- ☒ Targets to increase or maintain low-carbon energy consumption or production
- ☒ Targets to reduce methane emissions
- ☒ Net-zero targets
- ☒ Other climate-related targets

### (7.54.1) Provide details of your targets to increase or maintain low-carbon energy consumption or production.

#### Row 1

#### (7.54.1.1) Target reference number

*Select from:*

- ☒ Low 1

#### (7.54.1.2) Date target was set

01/01/2015

#### (7.54.1.3) Target coverage

*Select from:*

- ☒ Business activity

#### (7.54.1.4) Target type: energy carrier

Select from:

☒ Electricity

#### (7.54.1.5) Target type: activity

Select from:

☒ Production

#### (7.54.1.6) Target type: energy source

Select from:

☒ Renewable energy source(s) only

#### (7.54.1.7) End date of base year

12/31/2005

#### (7.54.1.8) Consumption or production of selected energy carrier in base year (MWh)

42078

#### (7.54.1.9) % share of low-carbon or renewable energy in base year

1.2

#### (7.54.1.10) End date of target

12/31/2025

**(7.54.1.11) % share of low-carbon or renewable energy at end date of target**

25

**(7.54.1.12) % share of low-carbon or renewable energy in reporting year**

24

**(7.54.1.13) % of target achieved relative to base year**

95.80

**(7.54.1.14) Target status in reporting year**

Select from:

☒ Underway

**(7.54.1.16) Is this target part of an emissions target?**

*Yes, this target supports MGE's Energy 2050 goal of achieving net zero carbon from energy supplied to customers by 2050.*

**(7.54.1.17) Is this target part of an overarching initiative?**

Select all that apply

☒ Other, please specify :This target is part of MGE's Energy 2050 Framework.

**(7.54.1.19) Explain target coverage and identify any exclusions**

*This target is an interim target aimed at supplying 25% of retail energy from renewable sources by 2025.*

## (7.54.1.21) Plan for achieving target, and progress made to the end of the reporting year

*MGE continues to make new investments in generation, including more energy from renewable resources. MGE continues to work closely with customers and through partnerships to encourage energy efficiency and conservation through education, information, technical assistance and other resources. MGE is on track to meet this 25% renewable energy target by 2025.*

### Row 2

#### (7.54.1.1) Target reference number

Select from:

☒ Low 2

#### (7.54.1.2) Date target was set

01/01/2015

#### (7.54.1.3) Target coverage

Select from:

☒ Business activity

#### (7.54.1.4) Target type: energy carrier

Select from:

☒ Electricity

#### (7.54.1.5) Target type: activity

Select from:

☒ Production

#### (7.54.1.6) Target type: energy source

Select from:

☒ Renewable energy source(s) only

#### (7.54.1.7) End date of base year

12/31/2005

#### (7.54.1.8) Consumption or production of selected energy carrier in base year (MWh)

42078

#### (7.54.1.9) % share of low-carbon or renewable energy in base year

1.2

#### (7.54.1.10) End date of target

12/31/2030

#### (7.54.1.11) % share of low-carbon or renewable energy at end date of target

30

#### (7.54.1.12) % share of low-carbon or renewable energy in reporting year

24

#### (7.54.1.13) % of target achieved relative to base year

79.17

#### (7.54.1.14) Target status in reporting year

Select from:

☒ Underway

#### (7.54.1.16) Is this target part of an emissions target?

*Yes, this target supports MGE's Energy 2050 goal of achieving net zero carbon from energy supplied to customers by 2050.*

#### (7.54.1.17) Is this target part of an overarching initiative?

Select all that apply

☒ Other, please specify :This target is part of MGE's Energy 2050 Framework.

#### (7.54.1.19) Explain target coverage and identify any exclusions

*This target aims to supply 30% of retail energy from renewable sources by 2030.*

#### (7.54.1.21) Plan for achieving target, and progress made to the end of the reporting year

*MGE continues to make new investments in generation, including more energy from renewable resources. MGE continues to work closely with customers and through partnerships to encourage energy efficiency and conservation through education, information, technical assistance and other resources. MGE is on track to meet this 25% renewable energy target by 2025.*

**(7.54.2) Provide details of any other climate-related targets, including methane reduction targets.**

**Row 1**

**(7.54.2.1) Target reference number**

Select from:

☒ Oth 1

**(7.54.2.2) Date target was set**

01/01/2020

**(7.54.2.3) Target coverage**

Select from:

☒ Business activity

**(7.54.2.4) Target type: absolute or intensity**

Select from:

☒ Absolute

**(7.54.2.5) Target type: category & metric (target numerator if reporting an intensity target)**

Low-carbon vehicles

☒ Percentage of low-carbon vehicles in company fleet

**(7.54.2.9) End date of target**

12/31/2030

**(7.54.2.10) Figure or percentage at end of date of target**

100

**(7.54.2.11) Figure or percentage in reporting year**

55

**(7.54.2.13) Target status in reporting year**

Select from:

☒ Underway

**(7.54.2.15) Is this target part of an emissions target?**

No

**(7.54.2.16) Is this target part of an overarching initiative?**

Select all that apply

☒ No, it's not part of an overarching initiative

**(7.54.2.18) Please explain target coverage and identify any exclusions**

*The target is to convert 100% of the light -duty vehicles in the MGE fleet to electric vehicles or plug-in hybrid vehicles by 2030.*

**(7.54.2.20) Plan for achieving target, and progress made to the end of the reporting year**

*MGE plans to purchase only electric or plug-in hybrid light-duty vehicles for its fleet going forward. This is planned to be accomplished primarily through the replacement of vehicles at the end of their useful life.*



(7.54.3) Provide details of your net-zero target(s).

Row 1

(7.54.3.1) Target reference number

Select from:

☒ NZ1

(7.54.3.2) Date target was set

01/01/2019

(7.54.3.3) Target Coverage

Select from:

☒ Organization-wide

(7.54.3.4) Targets linked to this net zero target

Select all that apply

- ☒ Abs1
- ☒ Abs2
- ☒ Abs3
- ☒ Abs4
- ☒ Abs5
- ☒ Abs6

(7.54.3.5) End date of target for achieving net zero

12/31/2050

### (7.54.3.6) Is this a science-based target?

Select from:

☒ Yes, we consider this a science-based target, and the target is currently being reviewed by the Science Based Targets initiative

### (7.54.3.8) Scopes

Select all that apply

☒ Scope 1

☒ Scope 3

### (7.54.3.9) Greenhouse gases covered by target

Select all that apply

☒ Carbon dioxide (CO2)

### (7.54.3.10) Explain target coverage and identify any exclusions

*In 2019, MGE built on its Energy 2030 framework for a more sustainable future by announcing a goal of net-zero carbon electricity by 2050. We believe this is a science-based target based on a study by the University of Wisconsin-Madison Nelson Institute for Environmental Studies and the Department of Atmospheric and Oceanic Sciences. The study is described further in Section C3 of this CDP report. In this work, IPCC scenarios relevant to MGE's operations and targets were evaluated.*

### (7.54.3.12) Do you intend to neutralize any residual emissions with permanent carbon removals at the end of the target?

Select from:

☒ Yes

### (7.54.3.13) Do you plan to mitigate emissions beyond your value chain?

Select from:

☒ No, we do not plan to mitigate emissions beyond our value chain

#### (7.54.3.14) Do you intend to purchase and cancel carbon credits for neutralization and/or beyond value chain mitigation?

*Select all that apply*

☒ No, we do not plan to purchase and cancel carbon credits for neutralization and/or beyond value chain mitigation

#### (7.54.3.15) Planned milestones and/or near-term investments for neutralization at the end of the target

*Our net-zero ambitions include offsetting any residual emissions that remain from our operations consistent with evolving technology.*

#### (7.54.3.17) Target status in reporting year

*Select from:*

☒ Underway

### Row 2

#### (7.54.3.1) Target reference number

*Select from:*

☒ NZ2

#### (7.54.3.2) Date target was set

01/01/2023

#### (7.54.3.3) Target Coverage

*Select from:*

☒ Business activity

#### (7.54.3.4) Targets linked to this net zero target

*Select all that apply*

☒ Not applicable

### (7.54.3.5) End date of target for achieving net zero

12/31/2035

### (7.54.3.6) Is this a science-based target?

Select from:

☒ No, but we are reporting another target that is science-based

### (7.54.3.8) Scopes

Select all that apply

☒ Scope 1

### (7.54.3.9) Greenhouse gases covered by target

Select all that apply

☒ Methane (CH<sub>4</sub>)

### (7.54.3.10) Explain target coverage and identify any exclusions

*MGE's goal is to achieve net-zero methane emissions from our natural gas distribution system by 2035. If we can go further faster, we will. MGE's strategies for achieving net-zero methane emissions include: Enhanced Leak Detection and Repair: MGE will explore strategies, practices and/or commercially available technologies that help us to meet or exceed current federal and state regulatory requirements surrounding leak detection and repair methods. We continue to gather data to improve our inventory of emissions data throughout our distribution system and to inform reduction efforts and strategies. Implementation of Cost-Effective Technologies and Processes: Improved monitoring of our system and estimated emissions will inform priorities for reduction opportunities. Consistent with those priorities, MGE will implement cost-effective technology to improve the detection, measurement, mitigation and/or reduction of emissions from the operation and maintenance of our natural gas distribution system. Renewable Natural Gas (RNG) to Offset Residual Emissions: MGE will explore the use of RNG in our natural gas system to offset any remaining emissions that cannot be directly controlled by MGE. New technologies, such as carbon capture, green hydrogen (zero-carbon hydrogen) and potentially other alternative fuels, continue to emerge and to evolve. MGE supports the research and development of these new technologies and will explore their potential use as they become available.*

### (7.54.3.12) Do you intend to neutralize any residual emissions with permanent carbon removals at the end of the target?

Select from:

☒ Yes

### **(7.54.3.13) Do you plan to mitigate emissions beyond your value chain?**

Select from:

☒ No, we do not plan to mitigate emissions beyond our value chain

### **(7.54.3.14) Do you intend to purchase and cancel carbon credits for neutralization and/or beyond value chain mitigation?**

Select all that apply

☒ No, we do not plan to purchase and cancel carbon credits for neutralization and/or beyond value chain mitigation

### **(7.54.3.15) Planned milestones and/or near-term investments for neutralization at the end of the target**

*MGE has already replaced all piping made of cast iron, bare or unprotected steel, and other material considered to be leak-prone in our natural gas distribution system. In addition, our leak inspection and repair schedules exceed federal requirements. Other strategies for achieving net-zero methane emissions include: Enhanced leak detection and repair Implementation of cost-effective technologies and processes to improve the detection, measurement, mitigation and reduction of emissions from the operation and maintenance of the natural gas system. Exploring the use of renewable natural gas (RNG) and other new technologies to offset residual emissions.*

### **(7.54.3.17) Target status in reporting year**

Select from:

☒ Underway

**(7.55) Did you have emissions reduction initiatives that were active within the reporting year? Note that this can include those in the planning and/or implementation phases.**

Select from:

☒ Yes

**(7.55.1) Identify the total number of initiatives at each stage of development, and for those in the implementation stages, the estimated CO2e savings.**

	Number of initiatives	Total estimated annual CO2e savings in metric tonnes CO2e
To be implemented	15	203232
Implementation commenced	2	22306
Implemented	2	50755

**(7.55.2) Provide details on the initiatives implemented in the reporting year in the table below.**

### Row 1

#### (7.55.2.1) Initiative category & Initiative type

Low-carbon energy consumption

☒ Solar PV

#### (7.55.2.2) Estimated annual CO2e savings (metric tonnes CO2e)

50755

#### (7.55.2.3) Scope(s) or Scope 3 category(ies) where emissions savings occur

Select all that apply

☒ Scope 1

#### (7.55.2.4) Voluntary/Mandatory

Select from:

☒ Voluntary

#### (7.55.2.8) Estimated lifetime of the initiative

Select from:

☒ 21-30 years

#### (7.55.2.9) Comment

*This question pertains to two projects (the Red Barn Wind Farm and the Badger Hollow Solar Farm) that came online in 2023 and ran for the entire 2024 calendar year. The Red Barn Wind Farm is Madison Gas and Electric's (MGE) newest wind farm, delivering cost-effective, carbon-free energy to the electric grid. MGE owns 9.1 megawatts (MW) of the 92- MW wind farm in the Grant County towns of Clifton and Wingville in Wisconsin. The Badger Hollow Solar Farm is a 300-MW renewable energy facility located near the communities of Montfort and Cobb in Iowa County, Wisconsin. The project came online in two 150-MW phases. The second phase began powering homes and businesses across Wisconsin in December 2023. MGE owns 100 MW of the 300- MW facility.*

### (7.55.3) What methods do you use to drive investment in emissions reduction activities?

#### Row 1

#### (7.55.3.1) Method

Select from:

☒ Other :Goals-driven

#### (7.55.3.2) Comment

*Our investments in renewable energy and other decarbonization strategies are driven by and consistent with our goals and framework for deep decarbonization.*

**(7.58) Describe your organization's efforts to reduce methane emissions from your activities.**

*MGE has completed an in-depth analysis and inventory of all its greenhouse gas emissions. Included in its study are methane emissions associated with the Company's distribution of natural gas. MGE has a goal to achieve net-zero methane emissions from its natural gas distribution system by 2035. Throughout MGE's natural gas distribution system, MGE already has replaced and upgraded all piping made of material considered to be leak-prone. Additionally, MGE's leak inspection schedule already exceeds federal requirements. To further address emissions associated with MGE's purchase and distribution of natural gas, MGE has committed to strategies for working with its suppliers, pipeline operators, customers, regulators and other industry stakeholders and to the exploration of new and emerging technologies, such as renewable natural gas, to serve its customers more sustainably. MGE offers a Renewable Natural Gas option for customers interested in offsetting their use of natural gas through Renewable Thermal Certificates purchased by MGE and tracked and retired by a third party. MGE is the first utility in the state to provide this option to customers looking to reduce their environmental impact. MGE also has proposed for State regulatory approval an RNG pilot that would provide new opportunities for local sources that produce RNG to become part of MGE's natural gas supply.*

**(7.74) Do you classify any of your existing goods and/or services as low-carbon products?**

Select from:

☒ Yes

**(7.74.1) Provide details of your products and/or services that you classify as low-carbon products.**

**Row 1**

**(7.74.1.1) Level of aggregation**

Select from:

☒ Product or service

**(7.74.1.2) Taxonomy used to classify product(s) or service(s) as low-carbon**

Select from:

☒ Other, please specify :Midwest Renewable Energy Tracking System.



### (7.74.1.3) Type of product(s) or service(s)

Power

☒ Other, please specify :Green Power Tomorrow

### (7.74.1.4) Description of product(s) or service(s)

*MGE's Green Power Tomorrow (GPT) is our green pricing program, which offers a convenient and effective way for customers to support local and regional renewable energy and offset their greenhouse gas emissions. Today, about 10,000 customers buy green power through this program. Our GPT program is served by our local and regional renewable energy resources.*

### (7.74.1.5) Have you estimated the avoided emissions of this low-carbon product(s) or service(s)

Select from:

☒ Yes

### (7.74.1.6) Methodology used to calculate avoided emissions

Select from:

☒ Other, please specify :RECs accounting

### (7.74.1.7) Life cycle stage(s) covered for the low-carbon product(s) or services(s)

Select from:

☒ Use stage

### (7.74.1.8) Functional unit used

*The functional unit used to define the activity is kWh of energy used by customers enrolled in MGE's Green Power Tomorrow program.*

### (7.74.1.9) Reference product/service or baseline scenario used

*The alternative to a kWh of energy used from renewable resources for MGE's Green Power Tomorrow program is energy from our grid that has a calculated carbon intensity.*

#### (7.74.1.10) Life cycle stage(s) covered for the reference product/service or baseline scenario

Select from:

☒ Use stage

#### (7.74.1.11) Estimated avoided emissions (metric tons CO2e per functional unit) compared to reference product/service or baseline scenario

246220

#### (7.74.1.12) Explain your calculation of avoided emissions, including any assumptions

*The calculation is  $G \text{ KWh/yr} * R \text{ lb/KWh} * 0.0005 \text{ ton/lb} * 0.9072 \text{ metric ton/ton} = AE \text{ metric ton/yr}$ , where:  $G$  is kwh/yr of GPT participation  $R$  is carbon intensity of our energy supplied  $AE$  is the metric ton/year avoided by GPT*

### Row 2

#### (7.74.1.1) Level of aggregation

Select from:

☒ Group of products or services

#### (7.74.1.2) Taxonomy used to classify product(s) or service(s) as low-carbon

Select from:

☒ Other, please specify :Midwest Renewable Energy Tracking System

#### (7.74.1.3) Type of product(s) or service(s)

Power

☒ Other, please specify :Shared Solar and Renewable Energy Rider

#### (7.74.1.4) Description of product(s) or service(s)

*MGE's Shared Solar program offers customers locally generated solar energy at minimal upfront cost. Shared Solar gives residential and small business customers the option to power their household or business with solar energy for up to half of their annual energy use. It's an affordable option for customers who want to support local solar. Our Renewable Energy Rider (RER) gives MGE and larger business customers who seek customized renewable energy solutions the opportunity to partner to grow locally generated renewable energy. The program is designed to meet the needs and goals of companies that support or have signed on to the Corporate Renewable Energy Buyers' Principles, a collaboration facilitated by the World Resources Institute and the World Wildlife Fund. MGE has built more than 40 MW of solar capacity under RER agreements since earning regulatory approval in 2017 to begin offering this clean energy option.*

#### (7.74.1.5) Have you estimated the avoided emissions of this low-carbon product(s) or service(s)

Select from:

☒ Yes

#### (7.74.1.6) Methodology used to calculate avoided emissions

Select from:

☒ Other, please specify :Energy Production

#### (7.74.1.7) Life cycle stage(s) covered for the low-carbon product(s) or services(s)

Select from:

☒ Use stage

#### (7.74.1.8) Functional unit used

*The functional unit used to define the activity is kWh of energy generated by the Shared Solar or RER program.*

#### (7.74.1.9) Reference product/service or baseline scenario used

*The alternative to a kWh of energy used from Shared Solar or RER is energy from our grid that has a calculated carbon intensity.*

#### (7.74.1.10) Life cycle stage(s) covered for the reference product/service or baseline scenario

Select from:

☒ Use stage

### (7.74.1.11) Estimated avoided emissions (metric tons CO2e per functional unit) compared to reference product/service or baseline scenario

164711

### (7.74.1.12) Explain your calculation of avoided emissions, including any assumptions

*The calculation is  $S \text{ KWh/yr} * R \text{ lb/KWh} * 0.0005 \text{ ton/lb} * 0.9072 \text{ metric ton/ton} = \text{AE metric ton/yr}$ , where:  $S$  is kwh/yr of Shared Solar and RER production  $R$  is carbon intensity of our energy supplied AE is the metric ton/year avoided by Shared Solar and RER*

## Row 3

### (7.74.1.1) Level of aggregation

Select from:

☒ Group of products or services

### (7.74.1.2) Taxonomy used to classify product(s) or service(s) as low-carbon

Select from:

☒ No taxonomy used to classify product(s) or service(s) as low carbon

### (7.74.1.3) Type of product(s) or service(s)

Power

☒ Other, please specify :Electrification of transportation initiatives

### (7.74.1.4) Description of product(s) or service(s)

*MGE provides low- carbon products to advance the electrification of transportation. Charge@Home is MGE's EV charging program for residential customers. MGE owns, maintains and coordinates the installation of Level 2 charging stations at customers' homes. The program allows MGE to study charging habits and to explore remote management of charging sessions to better understand the potential impact of EVs on the grid, including how grid management can help to lower costs for all MGE customers by optimizing our use of generation resources. A companion project is Charge Ahead, which also gives MGE the ability to manage customers' home charging remotely using a vehicle's onboard communications. By managing charging, MGE is able to shift EV charging to manage both long-term costs and peak*

*demand on the grid. MGE also helps to facilitate and to accelerate the growth of electric transportation through its public charging network, which is powered by renewable energy. Our public charging station network includes a fast-charging hub in downtown Madison. With power levels up to 350 kilowatts, the hub has some of the most powerful EV chargers in the Midwest. Through a partnership with Tesla, the hub also has eight Superchargers. MGE also recently introduced pole-mounted charging where the charger attaches to existing MGE utility poles in neighborhoods without easy access to EV charging.*

#### **(7.74.1.5) Have you estimated the avoided emissions of this low-carbon product(s) or service(s)**

Select from:

☒ No

#### **(7.79) Has your organization retired any project-based carbon credits within the reporting year?**

Select from:

☒ No

## C9. Environmental performance - Water security

### (9.1) Are there any exclusions from your disclosure of water-related data?

Select from:

☒ Yes

#### (9.1.1) Provide details on these exclusions.

##### Row 1

##### (9.1.1.1) Exclusion

Select from:

☒ Business activities

##### (9.1.1.2) Description of exclusion

*Water withdrawal, discharge and consumption values include activities associated with electricity generation activities. Water used in offices and other facilities is not included as it is a non material, minor use of water.*

##### (9.1.1.3) Reason for exclusion

Select from:

☒ Data is not available

##### (9.1.1.4) Primary reason why data is not available

Select from:

☒ Challenges associated with data collection and/or quality

## **(9.2) Across all your operations, what proportion of the following water aspects are regularly measured and monitored?**

### **Water withdrawals – total volumes**

#### **(9.2.1) % of sites/facilities/operations**

Select from:

☒ 100%

#### **(9.2.2) Frequency of measurement**

Select from:

☒ Continuously

#### **(9.2.3) Method of measurement**

*Facility water withdrawals are either estimated using pump run time data or measured using flow meters.*

#### **(9.2.4) Please explain**

*Monitoring of water withdrawals required by regulations and/or permits.*

### **Water withdrawals – volumes by source**

#### **(9.2.1) % of sites/facilities/operations**

Select from:

☒ 100%

#### **(9.2.2) Frequency of measurement**

Select from:

☒ Continuously

### (9.2.3) Method of measurement

*Facility water withdrawals are either estimated using pump run time data or measured using flow meters.*

### (9.2.4) Please explain

*Monitoring of water withdrawals required by regulations and/or permits.*

## Water withdrawals quality

### (9.2.1) % of sites/facilities/operations

*Select from:*

☒ 100%

### (9.2.2) Frequency of measurement

*Select from:*

☒ Continuously

### (9.2.3) Method of measurement

*Water quality parameters are either measured continuously through instrumentation or collected through grab or composite samples according to regulations and permit requirements.*

### (9.2.4) Please explain

*Water withdrawal quality measurements are done as required by regulations and/or permits and to optimize operations.*

## Water discharges – total volumes

### (9.2.1) % of sites/facilities/operations

*Select from:*

☒ 100%



### (9.2.2) Frequency of measurement

Select from:

☒ Continuously

### (9.2.3) Method of measurement

*Facility water discharges are either estimated using pump run time data or measured using flow meters.*

### (9.2.4) Please explain

*Monitoring of water discharges required by regulations and/or permits.*

## Water discharges – volumes by destination

### (9.2.1) % of sites/facilities/operations

Select from:

☒ 100%

### (9.2.2) Frequency of measurement

Select from:

☒ Continuously

### (9.2.3) Method of measurement

*Facility water discharges are either estimated using pump run time data or measured using flow meters.*

### (9.2.4) Please explain

*Monitoring of water discharges required by regulations and/or permits.*

## Water discharges – volumes by treatment method

### (9.2.1) % of sites/facilities/operations

Select from:

☒ 100%

### (9.2.2) Frequency of measurement

Select from:

☒ Continuously

### (9.2.3) Method of measurement

*Facility water discharges are either estimated using pump run time data or measured using flow meters.*

### (9.2.4) Please explain

*Monitoring of water discharges required by regulations and/or permits.*

## Water discharge quality – by standard effluent parameters

### (9.2.1) % of sites/facilities/operations

Select from:

☒ 100%

### (9.2.2) Frequency of measurement

Select from:

☒ Continuously

### (9.2.3) Method of measurement

*Water discharge quality parameters are either measured continuously through instrumentation, or collected through grab or composite samples according to regulations and permit requirements.*

### (9.2.4) Please explain

*Water withdrawal quality measurements are done as required by regulations and/or permits.*

## **Water discharge quality – emissions to water (nitrates, phosphates, pesticides, and/or other priority substances)**

### (9.2.1) % of sites/facilities/operations

*Select from:*

☒ 26-50

### (9.2.2) Frequency of measurement

*Select from:*

☒ Continuously

### (9.2.3) Method of measurement

*Water discharge quality parameters are either measured continuously through instrumentation, or collected through grab or composite samples according to regulations and permit requirements.*

### (9.2.4) Please explain

*Water withdrawal quality measurements are done as required by regulations and/or permits.*

## Water discharge quality – temperature

### (9.2.1) % of sites/facilities/operations

Select from:

☒ 100%

### (9.2.2) Frequency of measurement

Select from:

☒ Continuously

### (9.2.3) Method of measurement

*Temperature measurements of discharges are done using instrumentation and/or grab samples as required by regulations or permits.*

### (9.2.4) Please explain

*Discharge temperature measurements are required by permits and/or regulations at each facility.*

## Water consumption – total volume

### (9.2.1) % of sites/facilities/operations

Select from:

☒ 100%

### (9.2.2) Frequency of measurement

Select from:

☒ Continuously

### (9.2.3) Method of measurement

*Facility water withdrawal and discharge volumes are either estimated using pump run time data or measured using flow meters.*

#### (9.2.4) Please explain

*Water consumption is calculated based on withdrawal and discharge volumes but is not required by regulation and/or permits.*

### Water recycled/reused

#### (9.2.1) % of sites/facilities/operations

Select from:

☒ 26-50

#### (9.2.2) Frequency of measurement

Select from:

☒ Continuously

#### (9.2.3) Method of measurement

*Water recycled/reused is specifically measured through flow meters at our fossil-fueled generating stations equipped with cooling towers.*

#### (9.2.4) Please explain

*Approximately 50% of our fossil-fueled generating facilities are equipped with cooling towers which reuse water through cooling tower cycling.*

### The provision of fully-functioning, safely managed WASH services to all workers

#### (9.2.1) % of sites/facilities/operations

Select from:

☒ 100%

#### (9.2.2) Frequency of measurement

Select from:

☒ Continuously

### (9.2.3) Method of measurement

*Water quality of WASH services for workers is measured according to local ordinances.*

### (9.2.4) Please explain

*All facilities are equipped with fully-functioning WASH services for workers. Sources include groundwater wells and municipal water supply.*

**(9.2.2) What are the total volumes of water withdrawn, discharged, and consumed across all your operations, how do they compare to the previous reporting year, and how are they forecasted to change?**

#### **Total withdrawals**

##### (9.2.2.1) Volume (megaliters/year)

110557

##### (9.2.2.2) Comparison with previous reporting year

Select from:

☒ Higher

##### (9.2.2.3) Primary reason for comparison with previous reporting year

Select from:

☒ Increase/decrease in business activity

##### (9.2.2.4) Five-year forecast

Select from:

☒ About the same

#### (9.2.2.5) Primary reason for forecast

Select from:

☒ Other, please specify :In general, water withdrawals are tied to increases or decreases in power production.

#### (9.2.2.6) Please explain

*In general, water withdrawals are tied to increases or decreases in power production. Dispatch of MGE's electric generation units is dependent on energy demand as determined by the Midcontinent Independent System Operator (MISO) energy markets.*

### Total discharges

#### (9.2.2.1) Volume (megaliters/year)

105677

#### (9.2.2.2) Comparison with previous reporting year

Select from:

☒ Higher

#### (9.2.2.3) Primary reason for comparison with previous reporting year

Select from:

☒ Increase/decrease in business activity

#### (9.2.2.4) Five-year forecast

Select from:

☒ About the same

#### (9.2.2.5) Primary reason for forecast

Select from:

☒ Other, please specify :In general, water discharges are tied to increases or decreases in power production.

#### (9.2.2.6) Please explain

*In general, water discharges are tied to increases or decreases in power production. Dispatch of MGE's electric generation units is dependent on energy demand as determined by the Midcontinent Independent System Operator (MISO) energy markets.*

#### Total consumption

##### (9.2.2.1) Volume (megaliters/year)

4880

##### (9.2.2.2) Comparison with previous reporting year

Select from:

☒ Lower

##### (9.2.2.3) Primary reason for comparison with previous reporting year

Select from:

☒ Increase/decrease in efficiency

##### (9.2.2.4) Five-year forecast

Select from:

☒ About the same

##### (9.2.2.5) Primary reason for forecast

Select from:

☒ Other, please specify :In general, water consumption is tied to increases or decreases in power production.

#### (9.2.2.6) Please explain

*In general, water consumption is tied to increases or decreases in power production. Dispatch of MGE's electric generation units is dependent on energy demand as determined by the Midcontinent Independent System Operator (MISO) energy markets.*



**(9.2.4) Indicate whether water is withdrawn from areas with water stress, provide the volume, how it compares with the previous reporting year, and how it is forecasted to change.**

**(9.2.4.1) Withdrawals are from areas with water stress**

*Select from:*

☒ Yes

**(9.2.4.2) Volume withdrawn from areas with water stress (megaliters)**

24895

**(9.2.4.3) Comparison with previous reporting year**

*Select from:*

☒ Higher

**(9.2.4.4) Primary reason for comparison with previous reporting year**

*Select from:*

☒ Increase/decrease in business activity

**(9.2.4.5) Five-year forecast**

*Select from:*

☒ About the same

**(9.2.4.6) Primary reason for forecast**

*Select from:*

☒ Increase/decrease in business activity

#### (9.2.4.7) % of total withdrawals that are withdrawn from areas with water stress

22.52

#### (9.2.4.8) Identification tool

Select all that apply

☒ WRI Aqueduct

#### (9.2.4.9) Please explain

*MGE's owned generating facilities are located in areas defined as medium-high to high overall water risk by the Water Resources Institute (WRI) Aqueduct Water Risk Atlas (AWRA). Overall water risk is described by AWRA as measuring all water related risks such as quantity, quality, regulatory, and reputational. A watershed is considered a high-water stressed area when the ratio of total water demand to available renewable surface and groundwater supplies exceeds 40%. MGE is a minority joint owner in two coal-fueled generating facilities which are not located in high overall water risk areas. The majority of MGE's water withdrawals are attributed to coal-fueled generation, which are not located in overall high risk water areas. MGE operates under a Conditional Water Use Agreement associated with the West Campus Cogeneration Facility. Under this agreement, MGE is required to provide flow augmentation to the Yahara River during certain periods of low flow and operate an infiltration facility within the watershed in order to mitigate surface water withdrawals during periods of potential stress to the water table. In addition, our facilities either return a majority of cooling water back to the source water or operate cooling towers to minimize water withdrawals. MGE also works closely with regulatory agencies to obtain permits and manage water withdrawals to minimize environmental impacts.*

#### (9.2.7) Provide total water withdrawal data by source.

**Fresh surface water, including rainwater, water from wetlands, rivers, and lakes**

#### (9.2.7.1) Relevance

Select from:

☒ Relevant

#### (9.2.7.2) Volume (megaliters/year)

110043

### (9.2.7.3) Comparison with previous reporting year

Select from:

☒ Higher

### (9.2.7.4) Primary reason for comparison with previous reporting year

Select from:

☒ Increase/decrease in business activity

### (9.2.7.5) Please explain

*Surface withdrawals are generally proportional to electric generation, which was higher in 2024 than in 2023.*

## Brackish surface water/Seawater

### (9.2.7.1) Relevance

Select from:

☒ Not relevant

### (9.2.7.5) Please explain

*Our company does not withdraw from brackish surface water or seawater.*

## Groundwater – renewable

### (9.2.7.1) Relevance

Select from:

☒ Not relevant

### (9.2.7.5) Please explain

*Our company does not withdraw from renewable groundwater.*

## Groundwater – non-renewable

### (9.2.7.1) Relevance

Select from:

☒ Relevant

### (9.2.7.2) Volume (megaliters/year)

301

### (9.2.7.3) Comparison with previous reporting year

Select from:

☒ Lower

### (9.2.7.4) Primary reason for comparison with previous reporting year

Select from:

☒ Increase/decrease in business activity

### (9.2.7.5) Please explain

*Groundwater withdrawals in 2023 were primarily associated with mitigation efforts associated with MGE's Water Use Agreement requirements. In 2023 more mitigation was required than in 2024 due to drought conditions.*

## Produced/Entrained water

### (9.2.7.1) Relevance

Select from:

☒ Not relevant

#### (9.2.7.5) Please explain

*Our company does not withdraw from produced or entrained water.*

### Third party sources

#### (9.2.7.1) Relevance

Select from:

☒ Relevant

#### (9.2.7.2) Volume (megaliters/year)

214

#### (9.2.7.3) Comparison with previous reporting year

Select from:

☒ About the same

#### (9.2.7.4) Primary reason for comparison with previous reporting year

Select from:

☒ Other, please specify :Third party sources refer primarily to municipal water supplies used for facility operation not for electricity production.

#### (9.2.7.5) Please explain

*Third party sources include municipal water supply.*

## **(9.2.8) Provide total water discharge data by destination.**

### **Fresh surface water**

#### **(9.2.8.1) Relevance**

Select from:

☒ Relevant

#### **(9.2.8.2) Volume (megaliters/year)**

105335

#### **(9.2.8.3) Comparison with previous reporting year**

Select from:

☒ Higher

#### **(9.2.8.4) Primary reason for comparison with previous reporting year**

Select from:

☒ Increase/decrease in business activity

#### **(9.2.8.5) Please explain**

*Surface discharges are generally proportional to electric generation, which was higher in 2024 than in 2023.*

### **Brackish surface water/seawater**

#### **(9.2.8.1) Relevance**

Select from:

☒ Not relevant

#### (9.2.8.5) Please explain

*Our company does not discharge to brackish surface water or seawater.*

#### Groundwater

#### (9.2.8.1) Relevance

Select from:

☒ Relevant

#### (9.2.8.2) Volume (megaliters/year)

81

#### (9.2.8.3) Comparison with previous reporting year

Select from:

☒ Higher

#### (9.2.8.4) Primary reason for comparison with previous reporting year

Select from:

☒ Increase/decrease in business activity

#### (9.2.8.5) Please explain

*MGE operates an infiltration facility as part of a Water Use Agreement. This discharge is generally proportional to electric generation.*

#### Third-party destinations

#### (9.2.8.1) Relevance

Select from:

☒ Relevant

#### (9.2.8.2) Volume (megaliters/year)

262

#### (9.2.8.3) Comparison with previous reporting year

Select from:

☒ About the same

#### (9.2.8.4) Primary reason for comparison with previous reporting year

Select from:

☒ Increase/decrease in business activity

#### (9.2.8.5) Please explain

*Some systems at our generating facilities discharge to the municipal treatment system. This was slightly less in 2024 compared to 2023. These systems operate within a relatively consistent range from year to year.*

#### (9.2.9) Within your direct operations, indicate the highest level(s) to which you treat your discharge.

##### Tertiary treatment

#### (9.2.9.1) Relevance of treatment level to discharge

Select from:

☒ Relevant

#### (9.2.9.2) Volume (megaliters/year)

85575



### (9.2.9.3) Comparison of treated volume with previous reporting year

Select from:

☒ About the same

### (9.2.9.4) Primary reason for comparison with previous reporting year

Select from:

☒ Increase/decrease in business activity

### (9.2.9.5) % of your sites/facilities/operations this volume applies to

Select from:

☒ 21-30

### (9.2.9.6) Please explain

*MGE is a joint owner in the West Riverside Energy Center, which uses granular media filtration. MGE is also a joint owner in the Elm Road Generating Station, which uses a bioreactor and ultrafiltration system.*

### Secondary treatment

### (9.2.9.1) Relevance of treatment level to discharge

Select from:

☒ Not relevant

### Primary treatment only

### (9.2.9.1) Relevance of treatment level to discharge

Select from:

☒ Relevant

#### (9.2.9.2) Volume (megaliters/year)

19782

#### (9.2.9.3) Comparison of treated volume with previous reporting year

Select from:

☒ Higher

#### (9.2.9.4) Primary reason for comparison with previous reporting year

Select from:

☒ Increase/decrease in business activity

#### (9.2.9.5) % of your sites/facilities/operations this volume applies to

Select from:

☒ 21-30

#### (9.2.9.6) Please explain

*Primary treatment consists primarily of screening of once-through cooling water at generating facilities. Fluctuations in discharge from one year to the next are tied to changes in power production.*

#### Discharge to the natural environment without treatment

#### (9.2.9.1) Relevance of treatment level to discharge

Select from:

☒ Relevant

#### (9.2.9.2) Volume (megaliters/year)

59

### (9.2.9.3) Comparison of treated volume with previous reporting year

Select from:

☒ Lower

### (9.2.9.4) Primary reason for comparison with previous reporting year

Select from:

☒ Increase/decrease in business activity

### (9.2.9.5) % of your sites/facilities/operations this volume applies to

Select from:

☒ 41-50

### (9.2.9.6) Please explain

*Discharges to the natural environment without treatment are associated primarily with MGE's water mitigation efforts related to the Conditional Water Loss Agreement associated with the West Campus Cogeneration Facility. MGE is required to provide flow augmentation to the Yahara River during certain periods of low flow and operate an infiltration facility within the watershed. There was less flow augmentation required in 2024 compared to the previous year.*

### Discharge to a third party without treatment

### (9.2.9.1) Relevance of treatment level to discharge

Select from:

☒ Relevant

### (9.2.9.2) Volume (megaliters/year)

262

### (9.2.9.3) Comparison of treated volume with previous reporting year

Select from:

☒ About the same

### (9.2.9.4) Primary reason for comparison with previous reporting year

Select from:

☒ Increase/decrease in business activity

### (9.2.9.5) % of your sites/facilities/operations this volume applies to

Select from:

☒ 41-50

### (9.2.9.6) Please explain

*Some systems at our generating facilities discharge to the municipal treatment system. These systems operate within a relatively consistent range from year to year.*

**Other**

### (9.2.9.1) Relevance of treatment level to discharge

Select from:

☒ Not relevant

**(9.2.10) Provide details of your organization's emissions of nitrates, phosphates, pesticides, and other priority substances to water in the reporting year.**

### (9.2.10.2) Categories of substances included

Select all that apply

☒ Phosphates

#### (9.2.10.4) Please explain

Phosphorus discharges from MGE joint-owned facilities are monitored by the facility operators as required by the facility Wisconsin Pollutant Discharge Elimination System (WPDES) permits for each facility. Generation facilities operated by MGE are not required to sample and report phosphates or nitrates. MGE has already worked to eliminate the use of phosphate-containing additives in its systems.

#### (9.3) In your direct operations and upstream value chain, what is the number of facilities where you have identified substantive water-related dependencies, impacts, risks, and opportunities?

	Identification of facilities in the value chain stage
Direct operations	Select from: <input checked="" type="checkbox"/> No, we have not assessed this value chain stage for facilities with water-related dependencies, impacts, risks, and opportunities, and are not planning to do so in the next 2 years
Upstream value chain	Select from: <input checked="" type="checkbox"/> No, we have not assessed this value chain stage for facilities with water-related dependencies, impacts, risks, and opportunities, and are not planning to do so in the next 2 years

#### (9.5) Provide a figure for your organization's total water withdrawal efficiency.

	Revenue (currency)	Total water withdrawal efficiency	Anticipated forward trend
	676944000	6123.03	This value is not expected to vary significantly over the next several years.

## **(9.7) Do you calculate water intensity for your electricity generation activities?**

Select from:

☒ Yes

### **(9.7.1) Provide the following intensity information associated with your electricity generation activities.**

#### **Row 1**

##### **(9.7.1.1) Water intensity value (m3/denominator)**

1.7

##### **(9.7.1.2) Numerator: water aspect**

Select from:

☒ Freshwater consumption

##### **(9.7.1.3) Denominator**

Select from:

☒ MWh

##### **(9.7.1.4) Comparison with previous reporting year**

Select from:

☒ Lower

##### **(9.7.1.5) Please explain**

*Water intensity if based on equity-share of water consumed from electricity generation divided by total owned generation.*

(9.13) Do any of your products contain substances classified as hazardous by a regulatory authority?

	Products contain hazardous substances
	Select from: <input checked="" type="checkbox"/> No

(9.14) Do you classify any of your current products and/or services as low water impact?

(9.14.1) Products and/or services classified as low water impact

Select from:  
☒ Yes

(9.14.2) Definition used to classify low water impact

Renewable energy continues to play a critical role in MGE's strategy for reducing carbon emissions. In 2024, MGE added 26 megawatts (MW) of solar capacity to its energy supply mix. The majority of our water consumption is attributed to coal-fueled electricity generation. MGE continues to transition away from coal-fired generation and is a minority owner of coal-fired assets.

(9.15) Do you have any water-related targets?

Select from:  
☒ No, and we do not plan to within the next two years

### **(9.15.3) Why do you not have water-related target(s) and what are your plans to develop these in the future?**

#### **(9.15.3.1) Primary reason**

*Select from:*

☒ Other, please specify :Under evaluation

#### **(9.15.3.2) Please explain**

*We continue to evaluate whether to introduce a water related target.*



C11. Environmental performance - Biodiversity

(11.2) What actions has your organization taken in the reporting year to progress your biodiversity-related commitments?

(11.2.1) Actions taken in the reporting period to progress your biodiversity-related commitments

Select from:

☒ Yes, we are taking actions to progress our biodiversity-related commitments

(11.2.2) Type of action taken to progress biodiversity- related commitments

Select all that apply

☒ Land/water protection

☒ Species management

☒ Education & awareness

☒ Other, please specify :A goal in our EMS is to determine current pollinator-friendly habitat and to increase pollinator-friendly habitat on our properties. We incorporate pollinator plants at solar sites and review impacts from construction including endangered resources.

(11.3) Does your organization use biodiversity indicators to monitor performance across its activities?

	Does your organization use indicators to monitor biodiversity performance?
	<p>Select from:</p> <p><input checked="" type="checkbox"/> No, we do not use indicators, but plan to within the next two years</p>

## **(11.4) Does your organization have activities located in or near to areas important for biodiversity in the reporting year?**

### **Legally protected areas**

#### **(11.4.1) Indicate whether any of your organization's activities are located in or near to this type of area important for biodiversity**

Select from:

☒ Yes (partial assessment)

#### **(11.4.2) Comment**

*Catalogued and uncatalogued burial sites, endangered resources, protected habitats and streams, and other sensitivities exist within our electric and gas utility territories. MGE has a robust review process in place to manage impacts associated with our gas and electric construction projects to avoid or minimize these impacts.*

### **UNESCO World Heritage sites**

#### **(11.4.1) Indicate whether any of your organization's activities are located in or near to this type of area important for biodiversity**

Select from:

☒ Yes

#### **(11.4.2) Comment**

*The Herbert and Katherine Jacobs First House property is a UNESCO World Heritage Site located within MGE's electric and gas utility service area. MGE has a detailed process to review, prevent and minimize impacts to sensitive natural and cultural resources for any construction process supporting our operations.*

## UNESCO Man and the Biosphere Reserves

**(11.4.1) Indicate whether any of your organization's activities are located in or near to this type of area important for biodiversity**

*Select from:*

☒ No

## Ramsar sites

**(11.4.1) Indicate whether any of your organization's activities are located in or near to this type of area important for biodiversity**

*Select from:*

☒ Not assessed

## Key Biodiversity Areas

**(11.4.1) Indicate whether any of your organization's activities are located in or near to this type of area important for biodiversity**

*Select from:*

☒ Not assessed

## Other areas important for biodiversity

**(11.4.1) Indicate whether any of your organization's activities are located in or near to this type of area important for biodiversity**

*Select from:*

☒ Yes (partial assessment)

#### **(11.4.2) Comment**

*Our electric and gas service territories have many natural and cultural resources important to biodiversity. In addition to a robust review process to avoid or minimize impacts associated with our construction and maintenance of utilities, we often look for ways to enhance biodiversity and habitat consistent with our projects. Examples include pollinator habitat established at our MGE-owned and operated solar PV project sites.*

C13. Further information & sign off

(13.1) Indicate if any environmental information included in your CDP response (not already reported in 7.9.1/2/3, 8.9.1/2/3/4, and 9.3.2) is verified and/or assured by a third party?

	Other environmental information included in your CDP response is verified and/or assured by a third party	Primary reason why other environmental information included in your CDP response is not verified and/or assured by a third party
	Select from: <input checked="" type="checkbox"/> No, but we plan to obtain third-party verification/assurance of other environmental information in our CDP response within the next two years	Select from: <input checked="" type="checkbox"/> Not an immediate strategic priority

(13.3) Provide the following information for the person that has signed off (approved) your CDP response.

(13.3.1) Job title

Director, Safety, Sustainability and Environmental Affairs

(13.3.2) Corresponding job category

Select from:  
☒ Environmental, health and safety manager