

December 23, 2011

ELECTRONIC FILING

Mr. William Fannucchi Docket Coordinator Public Service Commission 510 North Whitney Way PO Box 7854 Madison, WI 53707-7854

Re: Supplemental Comments on Draft Environmental Impact Statement

Joint Application of Dairyland Power Cooperative, Northern States Power Company - Wisconsin, and Wisconsin Public Power Inc., for Authority to Construct and Place in Service 345 kV Electric Transmission Lines and Electric Substation Facilities for the CapX Twin Cities - Rochester - La Crosse Project, located in Buffalo, Trempealeau and La Crosse Counties, Wisconsin

PSCW Docket No. 5-CE-136

Dear Mr. Fannucchi:

Northern States Power Company, a Wisconsin corporation, on behalf of itself and its coapplicants, Dairyland Power Cooperative ("DPC") and WPPI Energy (collectively, "Applicants"), submit the following comments on the Draft Environmental Impact Statement ("DEIS") prepared by the Wisconsin Public Service Commission ("PSC") and the Department of Natural Resources ("DNR") for the Hampton—Rochester—La Crosse 345 kV Project ("Project"). These comments are intended to supplement those comments filed November 28, 2011 and provide additional alternative alignments along State Trunk Highway 35 ("STH 35") in response to permitting concerns raised by the Wisconsin Department of Transportation ("WisDOT").

WisDOT STH 35 Concerns

The Q1-Highway 35 and Q1-Galesville routes both include short segments that parallel STH 35. On November 22, 2011, WisDOT submitted a letter to the Federal Highway Administration ("WisDOT Letter") regarding these alignments. The WisDOT letter stated that WisDOT could issue crossing permits for crossings of STH 35. However, the letter raised questions regarding

Mr. William Fannucchi December 23, 2011 Page 2

whether WisDOT could issue utility permits for longitudinal transmission installations along STH 35, PSC Ref. #156191. On December 9, 2011, Applicants provided a response to WisDOT's letter stating that no poles would be located within STH 35 right-of-way, PSC Ref. # 156926. Robert Fasick, State Right-of-Way Accommodation and Permits Engineer for WisDOT, subsequently advised Applicants that WisDOT would require a utility permit for longitudinal installations wherever the transmission line right-of-way overlaps highway right-of-way.

To reinforce the Applicants' opinion that the routes under study in this proceeding are permittable, Applicants reviewed the Q1-Highway 35 and Q1-Galesville routes and identified three segments where the transmission line right-of-way along the proposed longitudinal alignments would overlap Highway 35 right-of-way: Segments 2A3/2B, 2C/2D and 8A/8B/8C. Applicants determined that minor alignment adjustments could be made so that no right-of-way overlap would occur. These alignment modifications could be used in the event that the Public Service Commission ("PSCW") approves the Q1-Highway 35 Route or the Q1-Galesville Route and if the WisDOT determines that it could not issue a utility permit for longitudinal installations along STH 35. Applicants believe that no longitudinal utility permit for STH 35 would be required if these alignment adjustments were implemented.

Segments 2A3/2B

In Segments 2A3/2B, a section of STH 35 in Buffalo County that is common to both the Q1-Highway 35 and Q1-Galesville routes, the right-of-way for a length of less than 4,000 feet might overlap highway right-of-way. The alignment can be shifted to the northeast side of the road to avoid the occupancy. Poles 21B and 22 would shift but remain on the northeast side of the road; poles 23 and 24 would move to the northeast side of the road; new pole 23A would be required. See **Attachment 1**.

Segments 2C/2D

In Segments 2C/2D near Cochrane, a section of STH 35 in Buffalo County that is common to both the Q1-Highway 35 and Q1-Galesville routes, the right-of-way of a single span of 1,025 feet between poles 46 and 47 might be construed as a longitudinal installation that overlaps highway right-of-way. This alignment developed because the Applicants located pole 47 closer to the highway to reduce impacts to the Walnut Grove Golf Course. The alignment of Pole 47 could be shifted 150 feet northeast to the alignment of the existing Dairyland Q1 line. Pole 48 would also be shifted to the northeast side of the road to avoid crossing at the STH 35 and County Road O intersection. No new poles would be required. See **Attachment 2**.

Mr. William Fannucchi December 23, 2011 Page 3

Segments 8A/8B/8C

Segments 8A/8B/8C are part of the Q1-Highway 35 Route and includes the crossing of the Black River flood plain. The right-of-way for a length of 3.5 miles would overlap highway right-of-way. Poles 200B through 223 can be shifted 40 to 70 feet farther from the highway to avoid overlap of the transmission line easement and highway right-of-way. See **Attachment 3.**

Based upon Applicants' review, the modified alignments would have impacts very similar to those of the Q1-Highway 35 and Q1-Galesville alignments on the STH 35 segments. The modified alignments would result in one (net) less poles in wetlands: two poles would be removed in the northern segments (2A3R / 2BR / 2A4R), one pole would be added on the new 8AR / 9R segment. The modified alignments would also decrease the proposed matting / temporary disturbance within wetland by approximately 1,800 to 1,900 feet within the 2A3R / 2BR / 2A4R segments.

Applicants request that the Final Environmental Impact Statement analyze these alternative alignments. To assist this analysis, Applicants are enclosing an impacts table, **Attachment 4** and route maps, **Attachment 5**.

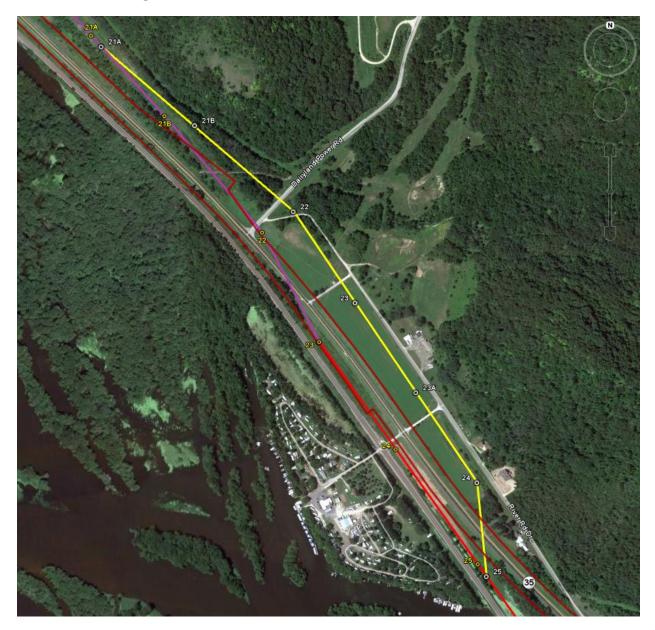
Please contact me with any questions.

Sincerely,

Xcel Energy
s/Thomas G. Hillstrom
Hillstrom
Xcel Energy

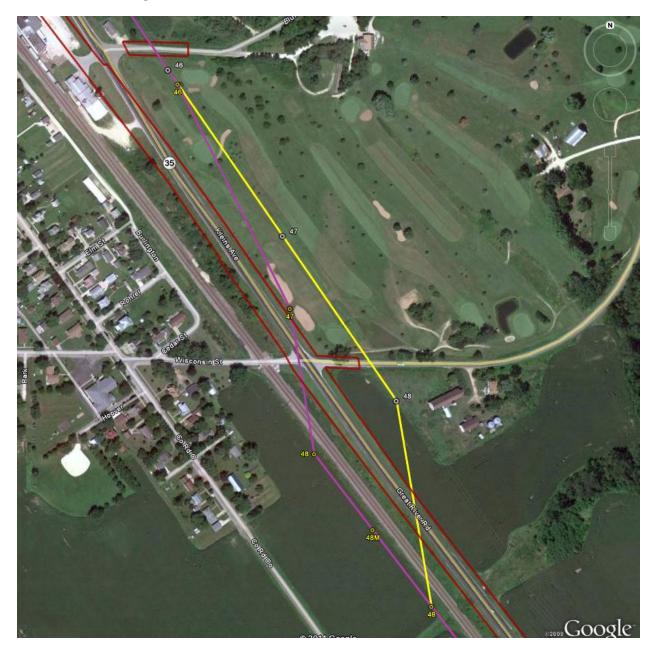
Enclosures

Attachment 1 – Segments 2A3/2B



Yellow = new alignment Red = alignment from application Maroon = Hwy 35 right-of-way

Attachment 2 – Segments 2C/2D



Yellow = new alignment Pink = alignment from application Maroon = Hwy 35 right-of-way Attachment 3 – Segments 8A/8B/8C



Overview



Example detail of alignment change in Black River flood plain



Example detail of alignment change east of Black River flood plain Yellow = new alignment

Pink = alignment from application

Maroon shading = Hwy 35 right-of-way

Attachment 4 Summary Comparison of Impacts for Alternative Q1 Segments South of Alma

Resource Category	OR	GINAL SEGMENTS		REVISED SEGMENTS				
	Segment 2A3	Segment 2B	TOTAL	Segment 2A3R	Segment 2A4R ¹	Segment 2BR	TOTAL	
General Route Impacts (Table 1A)								
Length sharing transmission line ROW (miles)	1.2	3.1	4.3	0.8	0	2.7	3.5	
Percent sharing transmission line ROW	100%	100%	100%	100%	0%	100%	81%	
Length sharing railroad ROW (miles)	0	0	0	0	0	0	0	
Percent sharing railroad ROW	0%	0%	0%	0%	0%	0%	0%	
Length sharing road ROW (miles)	0	0	0	0	0	0	0	
Percent sharing road ROW	0%	0%	0%	0%	0%	0%	0%	
Length not following transmission line, roads or railroads (miles)	0	0	0	0	0.8	0	0.8	
Percent not following transmission line, roads, or railroad	0%	0%	0%	0%	100%	0%	19%	
Total length (miles)	1.2	3.1	4.3	0.8	0.8	2.7	4.3	
Distance to Potentially Sensitive Buildings (Table 18	3)							
Number of residences 0-25 feet from route centerline	0	0	0	0	0	0	0	
Number of residences 26-50 feet from route centerline	0	0	0	0	0	0	0	
Number of residences 51-100 feet from route centerline	0	0	0	0	0	0	0	
Number of residences 101-150 feet from route centerline	1	0	1	1	0	0	1	
Number of residences 151-300 feet from route centerline	1	10	11	2	6	1	9	
Total residences 300 feet from route centerline	2	10	12	3	6	1	10	
Commercial/industrial 0-100 feet from route centerline	0	0	0	0	0	0	0	

_

¹ Segment 2A4R is a new segment that replaces the portions of Segment 2A3 and Segment 2B that no longer share ROW.

Attachment 4 Summary Comparison of Impacts for Alternative Q1 Segments South of Alma

Resource Category	OR	GINAL SEGMENTS		REVISED SEGMENTS					
	Segment 2A3	Segment 2B	TOTAL	Segment 2A3R	Segment 2A4R ¹	Segment 2BR	TOTAL		
Natural Resource, Residential, and Commercial Impacts (Table 2)									
Agricultural-existing ROW area shared (acres)	4.2	11.1	15.3	4.2	0	11.1	15.3		
Agricultural-new ROW area required (acres)	1.4	6.4	7.8	1.4	7.1	7.3	15.8		
Non-Agricultural Upland-existing ROW Area shared (acres)	4.4	0.9	5.3	3.6	0	0.9	4.5		
Non-Agricultural Upland-new ROW area required (acres)	1.0	0	1.0	0.9	2.4	0	3.3		
Non-Forested Wetland-existing ROW area shared (acres)	0.02	5.1	5.1	0	0	3.0	3.0		
Non-Forested Wetland-new ROW area required (acres)	0.05	2.1	2.1	0	0.4	2.0	2.4		
Forested Wetland-existing ROW area shared (acres)	0.3	2.4	2.7	0.1	0	2.4	2.5		
Forested Wetland-new ROW area required (acres)	0.1	1.5	1.6	0.1	0.3	1.8	2.2		
Developed-existing ROW area shared (acres)	1.6	0.8	2.4	1.0	0	0.7	1.7		
Developed-new ROW area required (acres)	0.4	0.4	0.8	0.4	0.4	0.5	1.3		
Public and Tribal Land Impacts (Table 3)									
Federal land (acres)	0	1.7	1.7	0	0	1.7	1.7		
State land (acres)	0	0	0	0	0	0	0		
County land (acres)	0	0	0	0	0	0	0		
Village/city land (acres)	0	0	0	0	0	0	0		

Attachment 4 Summary Comparison of Impacts for Alternative Q1 Segments Southeast of Cochrane

Resource Category	OF	RGINAL SEGMENTS	REVISED SEGMENTS							
	Segment 2C	Segment 2D	TOTAL	Segment 2CR	Segment 2DR	TOTAL				
General Route Impacts (Table 1A)	General Route Impacts (Table 1A)									
Length sharing transmission line ROW (miles)	1.4	1.8	3.2	1.5	1.7	3.2				
Percent sharing transmission line ROW	100%	100%	100%	100%	100%	100%				
Length sharing railroad ROW (miles)	0	0	0	0	0	0				
Percent sharing railroad ROW	0%	0%	0%	0%	0%	0%				
Length sharing road ROW (miles)	0	0	0	0	0	0				
Percent sharing road ROW	0%	0%	0%	0%	0%	0%				
Length not following transmission line, roads or railroads (miles)	0	0	0	0	0	0				
Percent not following transmission line, roads, or railroad	0%	0%	0%	0%	0%	0%				
Total length (miles)	1.4	1.8	3.2	1.5	1.7	3.2				
Distance to Potentially Sensitive Buildings (Table 18	3)									
Number of residences 0-25 feet from route centerline	0	0	0	0	0	0				
Number of residences 26-50 feet from route centerline	0	0	0	0	0	0				
Number of residences 51-100 feet from route centerline	2	0	2	2	0	2				
Number of residences 101-150 feet from route centerline	1	0	1	1	0	1				
Number of residences 151-300 feet from route centerline	1	0	1	1	0	1				
Total residences 300 feet from route centerline	4	0	4	4	0	4				
Commercial/industrial 0-100 feet from route centerline	0	0	0	0	0	0				

Attachment 4 Summary Comparison of Impacts for Alternative Q1 Segments Southeast of Cochrane

Resource Category	ORGINAL SEGMENTS			REVISED SEGMENTS					
	Segment 2C	Segment 2D	TOTAL	Segment 2CR	Segment 2DR	TOTAL			
Natural Resource, Residential, and Commercial Impacts (Table 2)									
Agricultural-existing ROW area shared (acres)	0.9	5.1	6	1.2	5.4	6.6			
Agricultural-new ROW area required (acres)	0.7	15.0	15.7	1.1	14.2	15.3			
Non-Agricultural Upland-existing ROW Area shared (acres)	6.9	0.1	7.0	6.9	0.0	6.9			
Non-Agricultural Upland-new ROW area required (acres)	5.6	0.04	5.6	5.6	0.0	5.6			
Non-Forested Wetland-existing ROW area shared (acres)	0	0	0	0.0	0.0	0.0			
Non-Forested Wetland-new ROW area required (acres)	0	0	0	0.0	0.0	0.0			
Forested Wetland-existing ROW area shared (acres)	0	0	0	0.0	0.0	0.0			
Forested Wetland-new ROW area required (acres)	0	0	0	0.0	0.0	0.0			
Developed-existing ROW area shared (acres)	4.8	0.2	5.0	5.5	0.0	5.5			
Developed-new ROW area required (acres)	3.6	0.01	3.6	4.5	0.0	4.5			
Public and Tribal Land Impacts (Table 3)									
Federal land (acres)	0	0	0	0	0	0			
State land (acres)	0	0	0	0	0	0			
County land (acres)	0	0	0	0	0	0			
Village/city land (acres)	0	0	0	0	0	0			

Attachment 4 Summary Comparison of Impacts for Alternative Q1 Segments Across Black River Floodplain

		ORGII		REVISED SEGMENTS					
Resource Category	Segment 8A	Segment 8B	Segment 8C	Segment 9	TOTAL	Segment 8AR ²	Segment 9R	TOTAL	
General Route Impacts (Table 1A)									
Length sharing transmission line ROW (miles)	0	0	0	0	0	0	0	0	
Percent sharing transmission line ROW	0%	0%	0%	0%	0%	0%	0%	0%	
Length sharing railroad ROW (miles)	0	0	0	0	0	0	0	0	
Percent sharing railroad ROW	0%	0%	0%	0%	0%	0%	0%	0%	
Length sharing road ROW (miles)	0	2.3	1.1	2.4	5.8	0	2.1	2.1	
Percent sharing road ROW	0%	100%	100%	100%	84%	0%	100%	30%	
Length not following transmission line, roads or railroads (miles)	1.1	0	0	0	1.1	4.8	0	5.8	
Percent not following transmission line, roads, or railroad	100%	0%	0%	0%	16%	100%	0%	70%	
Total length (miles)	1.1	2.3	1.1	2.4	6.9	4.8	3.1	6.9	
Distance to Potentially Sensitive Buildings (Table 18	3)								
Number of residences 0-25 feet from route centerline	0	0	0	0	0	0	0	0	
Number of residences 26-50 feet from route centerline	0	0	0	0	0	0	0	0	
Number of residences 51-100 feet from route centerline	0	0	0	1	1	0	1	1	
Number of residences 101-150 feet from route centerline	0	1	0	2	3	2	2	4	
Number of residences 151-300 feet from route centerline	0	1	1	9	11	2	9	11	
Total residences 300 feet from route centerline	0	2	1	12	15	4	12	17	

_

² Segment 8AR replaces the portions of Segments 8A, 8B, 8C, and 9 that no longer share ROW.

Attachment 4 Summary Comparison of Impacts for Alternative Q1 Segments Across Black River Floodplain

		ORGIN		REVISED SEGMENTS						
Resource Category	Segment 8A	Segment 8B	Segment 8C	Segment 9	TOTAL	Segment 8AR ²	Segment 9R	TOTAL		
Commercial/industrial 0-100 feet from route centerline	0	0	0	0	0	0	0	0		
Natural Resource, Residential, and Commercial Impo	acts (Table 2)									
Agricultural-existing ROW area shared (acres)	0	0.2	3.1	0	3.3	1.0	0.0	1.4		
Agricultural-new ROW area required (acres)	16.1	8.3	2.7	7.4	34.5	34.7	6.0	40.7		
Non-Agricultural Upland-existing ROW Area shared (acres)	0	0.9	0.7	0.1	1.7	0.0	0.1	0.1		
Non-Agricultural Upland-new ROW area required (acres)	3.0	2.3	0	10.6	15.9	9.0	8.5	17.5		
Non-Forested Wetland-existing ROW area shared (acres)	0	0,7	0	0	0.7	0.0	0.0	0.0		
Non-Forested Wetland-new ROW area required (acres)	0	1.8	0	0	1.8	1.6	0.0	1.6		
Forested Wetland-existing ROW area shared (acres)	0	7.2	0	0	7.2	1.5	0.0	1.5		
Forested Wetland-new ROW area required (acres)	0	18.5	0	0	18.5	24.6	0.0	24.6		
Developed-existing ROW area shared (acres)	0	0.1	1.6	0	1.7	0.0	0.0	0.6		
Developed-new ROW area required (acres)	0	3.9	0	0.4	4.3	6.8	0.4	7.2		
Public and Tribal Land Impacts (Table 3)	Public and Tribal Land Impacts (Table 3)									
Federal land (acres)	0	0	0	0	0	0	0	0		
State land (acres)	0	1.7	0	0	1.7	1.7	0	1.7		
County land (acres)	0	0	0	0	0	0	0	0		
Village/city land (acres)	0	0	0	0	0	0	0	0		

