

**BEFORE THE
PUBLIC SERVICE COMMISSION OF WISCONSIN**

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

Docket No. 05-CE-136

**COMMENTS OF THE CITIZENS UTILITY BOARD ON COMMISSION STAFF'S
BRIEFING MEMO AND DECISION MATRIX**

The Citizens Utility Board (CUB) hereby submits its comments on Commission staff's Briefing Memorandum (Briefing Memo) and Decision Matrix in the above-captioned proceeding. CUB appreciates the comprehensive and thorough nature of the Briefing Memo and Decision Matrix and notes that its positions are generally fairly and adequately summarized in them although a more complete recitation of the facts and the parties' positions are, of course, available in the record and the briefs. These comments clarify CUB's position with respect to the issue of the Project's purported regional benefits.

The Briefing Memo states:

CUB disagrees that the local benefits to Wisconsin ratepayers justify the cost of the proposed 345 kV project into the La Crosse area. CUB witness Mr. Hahn proposed an alternative hybrid system, as described in Section 1c above. This hybrid alternative would bring only new 161 kV facilities to La Crosse but preserve the attributes of a continuous 345 kV network for later connection if and when desired.

Briefing Memo, p. 16. The Briefing Memo correctly notes that Mr. Hahn's hybrid alternative solves the local reliability problem and preserves the attributes of any potential regional benefits of constructing a 345 kV line beyond Alma until an application for the Badger Coulee line is

presented for Commission consideration. But the Briefing Memo omits CUB's position that the Applicants did not identify the regional benefits of the Applicants proposal, by itself, to Wisconsin ratepayers. As Mr. Hahn noted, the Applicants' quantification of regional production cost benefits included construction of the Badger Coulee line as well as the Applicants' proposal, not the Applicants' proposal by itself. (Hahn, Tr. O74-75; Direct-CUB-Hahn-25) Moreover, the enhanced deliverability and lower congestion costs posited by the Applicants would benefit the entire MISO region, not just Wisconsin. (Surrebuttal-CUB-Hahn-8) Similarly, the loss savings cited by Ms. King in the Supplemental Need Study occur over the entire Eastern Interconnect, not just Wisconsin. (Direct-CUB-Hahn-25) A more accurate description of CUB's position can be found in this summary in Mr. Hahn's testimony:

Given the high proportion of costs Wisconsin ratepayers will be required to pay for the proposed 345 kV Project, the Applicants should quantitatively identify a correspondingly high regional benefit of the Project **to Wisconsin**. They have not done so.

(Direct-CUB-Hahn-25, *emphasis added*)

CUB appreciates the Commission's consideration of these comments.

Dated this 30th day of April, 2012.

Respectfully submitted,

/s/ Kira E. Loehr

By: _____

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