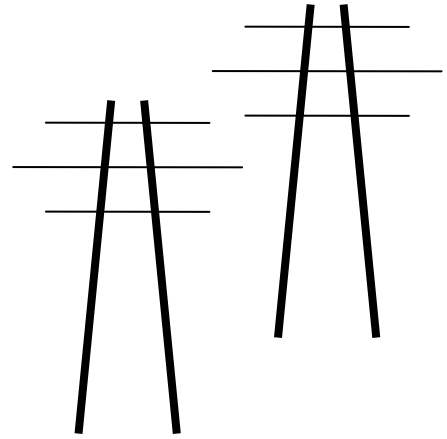


Legalelectric, Inc.

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March 1, 2013

The Honorable Kimberly D. Bose, Secretary
Federal Energy Regulatory Commission
Office of the Secretary
888 First St. N.E.
Washington, DC 20426

RE: Citizens Energy Task Force and Save Our Unique Lands, Complainants, v. Midwest Reliability Organization (MRO); Midwest Independent Transmission System Operator, Inc. (MISO); and utilities Xcel Energy, Inc. (Northern States Power Company, a Wisconsin Corporation, Northern States Power Company, a Minnesota Corporation, d/b/a Xcel Energy); Great River Energy, a Minnesota Cooperative Corporation; Dairyland Power Cooperative, a Wisconsin Cooperative Corporation; Wisconsin Public Power Inc., a Wisconsin corporation; as Applicants for the CapX 2020 Hampton-La Crosse Transmission Project.

Dear Secretary Boese:

Enclosed for filing please find Complaint of Citizens Energy Task Force and Save Our Unique Lands, pursuant to Rule 206 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission, and Certificate of Service in the above-entitled matter.

If you have any questions, please let me know.

Very truly yours,

Carol A. Overland
Attorney at Law

**UNITED STATES OF AMERICA
FEDERAL ENERGY REGULATORY COMMISSION**

**Citizens Energy Task Force and
Save Our Unique Lands,**

Complainants,

v.

Docket No. EL13-_____

**Midwest Reliability Organization (MRO);
Midwest Independent Transmission System
Operator, Inc. (MISO); and utilities Xcel Energy,
Inc. (Northern States Power Company, a
Wisconsin Corporation, Northern States Power
Company, a Minnesota Corporation, d/b/a Xcel
Energy); Great River Energy, a Minnesota
Cooperative Corporation; Dairyland Power
Cooperative, a Wisconsin Cooperative
Corporation; Wisconsin Public Power Inc., a
Wisconsin corporation; as Applicants for the
CapX 2020 Hampton-La Crosse Transmission Project.**

CERTIFICATE OF SERVICE

Carol A. Overland certifies that on March 1, 2013, I hereby certify that a true and correct copy of the foregoing document was served by electronic mail upon respondents and all others that maybe be affected by the complaint, as required by FERC's Regulations.

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Dated: March 1, 2013



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**UNITED STATES OF AMERICA
BEFORE THE
FEDERAL ENERGY REGULATORY COMMISSION**

**Citizens Energy Task Force and
Save Our Unique Lands,**

Complainants,

v.

Docket No. EL13-_____

**Midwest Reliability Organization (MRO);
Midwest Independent Transmission System
Operator, Inc. (MISO); and as Applicants
for the CapX 2020 Hampton-La Crosse
Transmission Project Xcel Energy, Inc.
(Northern States Power Company, a
Wisconsin Corporation, Northern States Power
Company, a Minnesota Corporation, d/b/a Xcel
Energy); Great River Energy, a Minnesota
Cooperative Corporation; Dairyland Power
Cooperative, a Wisconsin Cooperative
Corporation; Wisconsin Public Power Inc., a
Wisconsin corporation;**

**COMPLAINT OF
CITIZENS ENERGY TASK FORCE AND SAVE OUR UNIQUE LANDS**

Pursuant to Section 306 of the Federal Power Act (hereinafter “FPA”)¹ and Rule 206 of the Rules of Practice and Procedure of the Federal Energy Regulatory Commission (hereinafter “Commission”)², Citizens Energy Task Force and Save Our Unique (hereinafter “CETF/SOUL”) submits this Complaint (“Complaint”). CETF and SOUL respectfully request that the Federal Energy Regulatory Commission order that the addition of the Hampton-Rochester-La Crosse transmission line is prohibited because it contributes to and/or causes electrical system

¹ 16 U.S.C. 825e (2006)

² 18 C.F.R. §385.206 (2010).

instability, that the Midwest Reliability Organization (MRO) has neglected its duty to preserve the reliability of the system, and that the Commission issue an Order to Show Cause that MRO, MISO and utilities demonstrate that the addition of the CapX 2020 Hampton-La Crosse transmission line does not contribute to and/or cause system instability, and why the Midwest Independent Transmission Service Operator (MISO) approval of the CapX 2020 Hampton-La Crosse transmission project should not be revoked.

The link between the CapX 2020 Hampton-La Crosse transmission project and system instability is an electrical fact disclosed and admitted to by the Applicants in a press release and various documents including electrical studies conducted by all or some of the Applicants, and which are quoted, cited and linked in this Complaint. These studies were closely held, and while in progress during the MTEP 08 process they were not publicly disclosed – not disclosed until after that process was completed, MTEP 08 approved, and after the Minnesota CapX Certificate of Need had been granted in Minnesota. The CapX 2020 Hampton-La Crosse transmission line was proposed as a stand alone project, but only after its MTEP 08 approval is information disclosed that shows that in order to provide benefits and prevent instability, an extension to connect to the 345kV grid further east is necessary. Without that extension, the Hampton-La Crosse transmission line will not perform as claimed.

In the rush for “Capacity Expansion” to serve the market and reap economic benefits of decreased production costs and access to economic transactions, the sanctity of a stable transmission system and responsibility of transmission RTOs, ISOs, and transmission owners to assure transmission grid security was overlooked, ignored and circumvented. Proposing, planning, and approving a transmission line without regard for system instability is a violation of NERC standards and criteria.

I. COMMUNICATIONS

All correspondence and communications to the Complainants in this docket should be addressed to the following individual, whose names should be entered on the official service list:

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(612) 227-8638
overland@legalelectric.org (email preferred)

II. BACKGROUND

CETF is a Minnesota and Wisconsin non-profit corporation, a grassroots advocacy group formed to advocate sustainable and renewable energy options and to oppose the CapX 2020 transmission project. CETF intervened as a full party in the Minnesota CapX Certificate of Need proceeding, submitted Comments in several routing dockets, and intervened also as a full party in the Wisconsin CapX Hampton-La Crosse CPCN docket. In Minnesota, CETF filed a Motion for Reconsideration and appealed the Certificate of Need decision, and that decision was affirmed by the Appellate Court. In Wisconsin, CETF filed a Request for Rehearing with the WI Public Service Commission and a Request for Judicial Review, citing numerous violations of state and federal laws, including the illegal segmentation of the CapX and Badger Coulee lines and the CapX2020 grid instability issues. The WI PSC blocked the Judicial Review. CETF also filed for intervention in FERC docket EL-12-28 regarding ownership of the Hampton-La Crosse transmission line.

SOUL is a Wisconsin non-profit corporation, a grassroots advocacy group initially formed in response to the Arrowhead transmission project. SOUL's current work is advocating for reforms in energy policy that consider the financial, environmental and grid stability

alternatives to transmission. SOUL has been educating citizens and municipal governments about the Badger-Coulee transmission project a/k/a La Crosse-Madison transmission project and the seven other projects pending in Wisconsin.

CETF and SOUL, as grassroots energy advocacy organizations, and with members who are landowners along the route of the Hampton-La Crosse and Badger-Coulee transmission lines, have joined in this Complaint because they have similar interests in the reliability of the transmission system, the various non-transmission means that grid reliability can be enhanced, the characterization of demand for electricity, need for transmission projects, recognition of the magnitude of the transmission proposed by utilities in the region, and the desire to consider cost-benefits of reliability projects where equal investments in transmission and transmission alternatives are evaluated and all accessible cost/benefits be included.

III. Respondent Parties

The Respondent parties in this matter are Midwest Reliability Organization and Midwest Independent Transmission System Operator, those with authority and responsibilities for the reliability of the transmission system, and Xcel Energy, Great River Energy, Dairyland Power Cooperative and Wisconsin Public Power, those designated as applicants for the CapX 2020 Hampton-La Crosse transmission project in Minnesota and Wisconsin. For the purposes of this Complaint, the utilities and cooperatives are referred to as “Applicants” as they were designated as such in state permitting proceedings and ownership of the various projects is in question.

Midwest Reliability Organization, Inc.

The Midwest Reliability Organization, Inc. (hereinafter “MRO”), is a Delaware nonprofit corporation formed in 2005 and focused on maintaining the electric reliability of the grid through adoption of North American Electric Reliability Corporation (hereinafter “NERC”) Reliability

Standards, procedures and processes. The MRO procedures, processes and practices are incorporated into the Reliability Plans of the Midwest Independent Transmission Service Operator. From MRO's Bylaws:

... a Regional Entity within the NERC structure for the purpose of preserving and enhancing electric service reliability, adequacy and security in the Corporate Region and other interconnected regions for the benefit of all end-users of electricity and all entities engaged in providing electric services in the Corporate Region.

In support and furtherance of its purpose, the Corporation's responsibilities shall include, but not be limited to: (1) proposing Reliability Standards, including regional variances or regional Reliability Standards required to maintain and enhance electric service reliability, adequacy and security in the Corporate Region; (2) assessing compliance with and enforcing Reliability Standards, to the extent authorized by applicable agreements and/or law governing a Member's membership in the Corporation, (3) conducting investigations and data analysis on disturbances, system events, and related matters; (4) conducting long-term assessments of reliability within the Corporate region² and (5) other related activities.

In furthering the electric service reliability responsibilities, members have obligations and agree to comply with applicable reliability standards and NERC rules.

Midwest Independent Transmission System Operator, Inc.

Midwest Independent Transmission System Operator, Inc., is a Delaware Non-Stock Corporation, a not-for-profit regional transmission organization approved by FERC. MISO was the first Independent System Operator.³ As an RTO, MISO is responsible for planning and managing the transmission grid and access to it, and as an ISO for administering mandates of FERC Order No. 890⁴ with transmission planning in the MISO region as provided by the MISO

³ Midwest Independent Transmission System Operator, Inc. 84 FERC ¶ 61,231, (September 16 Order), order on reconsideration, 85 FERC ¶ 61,250, order on reh'g, 85 FERC ¶ 61,372 (1998), Opinion No. 453, 97 FERC ¶ 61,033 (Opinion No. 453), order denying reh'g in part and clarifying prior order, 98 FERC ¶ 61,141 (Opinion No. 453-A) (2001), order on remand 102 FERC ¶ 61,192, reh'g pending (2003).

⁴ *Preventing Undue Discrimination and Preference in Transmission Service*, Order No. 890, FERC Stats. & Regs. ¶ 31,241, order on reh'g, Order No. 890-A, FERC Stats. & Regs. ¶ 31,261 (2007), order on reh'g, Order No. 890-B, 123 FERC ¶ 61,299

Tariff, Attachment FF. MISO's transmission planning resulted in the Midwest Transmission Expansion Plan (hereinafter "MTEP"), specifically the MTEP 08 approved the CapX 2020 Hampton-La Crosse transmission line utilizing 2004 data. MISO is also responsible for operating control of the transmission systems within MISO territory pursuant to the MISO Transmission Operating Agreement. MISO has a wide range of stakeholders that includes end use and environmental members, giving MISO a unique opportunity to advance alternatives to transmission operations and reliability, including the potential contributions of energy efficiency, demand side management, interruptible load and member-owned distributed generation that would enable increased market transactions without additions of transmission infrastructure.

Xcel Energy, Inc.

Xcel Energy, Inc. (hereinafter "Xcel"), is a Minnesota corporation. Northern States Power Minnesota, a Minnesota corporation and transmission owner ("hereinafter "NSPM"), and Northern States Power Company, a Wisconsin corporation and transmission owner (hereinafter "NSPW"), are first-tier subsidiaries of Xcel Energy, Inc., a public utility holding company within the meaning of the Public Utility Holding Company Act of 2005. NSPM and NSPW are companies that provide generation, transmission and distribution services, and are transmission owners in MISO and an Applicant/Owner of the CapX 2020 Hampton – La Crosse transmission project in Minnesota and Wisconsin.

Great River Energy

Great River Energy is a Minnesota Cooperative Corporation, and provider of electric generation, transmission and, in conjunction with its partner distribution cooperatives,

(2008) *order on reh'g*, Order No. 890-C, 126 FERC ¶ 61,228 (2009), *order on reh'g*, Order No. 890-D, 129 FERC ¶ 61,126 (2009).

distribution services and is a transmission owner in MISO and an Applicant/Owner of the CapX 2020 Hampton – La Crosse transmission project in Minnesota.

Dairyland Power Cooperative

Dairyland Power Cooperative (hereinafter “Dairyland”) is a not-for-profit generation and transmission electric cooperative, a Wisconsin Cooperative Corporation, and provider of electric generation, transmission and, in conjunction with its partner distribution cooperatives, distribution services and is a transmission owner in MISO and an Applicant/Owner of the CapX 2020 Hampton – La Crosse transmission project in Wisconsin. Dairyland provides wholesale power requirements for distribution cooperatives and municipal utilities in Minnesota, Wisconsin, Iowa and Illinois.

Wisconsin Public Power, Inc.

Wisconsin Public Power, Inc. and WPPI Energy, Inc. (hereinafter “WPPI”) are Wisconsin Corporations, and providers of electric generation, transmission and distribution services and is a transmission owner in MISO and an applicant for the CapX 2020 Hampton – La Crosse transmission project in Wisconsin. WPPI Energy provides power supply and other services to member load located in the vicinity of the CapX 2020 Hampton – La Crosse transmission projects. WPPI is an applicant for the CapX 2020 Hampton – La Crosse transmission project in Wisconsin.

Affected Regulatory Agencies

The Wisconsin Public Service Commission and the Minnesota Public Utilities Commission are regulatory agencies affected by this action:

Wisconsin Public Service Commission
Sandara Paske, Secretary to the Commission
610 North Whitney Way
P.O. Box 7854
Madison, WI 53707-7854

Minnesota Public Utilities Commission
Burl Haar, Executive Secretary
121 – 7th Place East, Suite 350
St. Paul, Minnesota 55101

The Wisconsin Public Service Commission issued a Certificate of Public Convenience and Necessity, and the Minnesota Public Utilities Commission issued a Certificate of Need and Routing Permits for the CapX 2020 Group 1 projects, and specifically for the CapX 2020 Hampton-La Crosse transmission project.

IV. MIDWEST RELIABILITY ORGANIZATION, MIDWEST INDEPENDENT TRANSMISSION SYSTEM OPERATOR AND APPLICANTS HAVE FAILED TO ADDRESS INHERENT AND ADMITTED INSTABILITY AND RELIABILITY CONCERNS OF CAPX 2020 HAMPTON-LA CROSSE TRANSMISSION PROJECT

This Complaint is focused on the responsibilities and obligations of the Midwest Reliability Organization (hereinafter “MRO”) and the Midwest Independent Transmission System Operator (hereinafter “MISO”) Commission, and the Applicants of the CapX 2020 Hampton-La Crosse transmission project. FERC has adopted NERC standards and authorized enforcement by the MRO, and also MISO. Approval of the CapX 2020 Hampton-La Crosse transmission line, which by design will cause system instability, is a violation of the reliability mandates of these organizations and a violation of NERC standards and criteria as adopted by the Commission.

The specific standards violated are found in the NERC Transmission Planning criteria and include:

- FAC-002-1
- TPL-001-0.1
- TPL-001-2
- TPL-001-3
- TPL-001-4

CETF/SOUL requests that the Federal Energy Regulatory Commission find that the addition of the Hampton-Rochester-La Crosse transmission line is prohibited because it contributes to and/or causes system instability, rather than ease congestion it brings congestion to La Crosse, that the Midwest Reliability Organization (MRO) has neglected its duty to preserve the reliability of the system. CETF/SOUL further requests that the Commission revoke the Midwest Independent Transmission Service Operator (MISO) approval of the CapX 2020 Hampton-La Crosse transmission project because the addition of the Hampton-Rochester-La Crosse transmission line contributes to and/or causes system. The link between the CapX 2020 Hampton-La Crosse transmission project and system instability is an electrical fact admitted to by the Applicants in a press release and various documents including electrical studies.

For the purposes of this Complaint, CETF and SOUL adopt the NERC definition: NERC defines the reliability of the interconnected BPS in terms of two basic and functional aspects:

- Adequacy — is the ability of the electric system to supply the aggregate electric power and energy requirements of the electricity consumers at all times, taking into account scheduled and reasonably expected unscheduled outages of system components.
- Operating Reliability — is the ability of the electric system to withstand sudden disturbances such as electric short circuits or unanticipated loss of system components.

NERC 2011 Long Term Reliability Assessment, p. 491, Appendix III: Reliability Concepts Used in this Report. In this case, we're concerned with both aspects of reliability, the ability of the system to supply electricity consumers and also the ability of the system to withstand sudden disturbances, such as those associated with voltage instability.

Because the Midwest Reliability Organization, Inc. is required to protect the electric reliability of the grid and has failed to do so, this Complaint is requesting an Order from the Commission, as above. The Midwest Independent Transmission System Operator has also been

negligent and failed to protect the electric reliability of the grid in its adoption and approval of the Hampton-La Crosse transmission project. Applicants have proposed and secured MTEP08 approval contrary to NERC standards and criteria and failed to protect the electric reliability of the grid in its application for the Hampton-La Crosse transmission project when they knew or should have known that the projects were electrically unsound. Additionally, by aggressively marketing the regional benefits of CapX2020 without conveying the issues and by including the benefits of the a line that would extend from La Crosse to Madison in all its economic studies, have been deceptive in their planning to the detriment of ratepayers and municipalities who will host, pay for and suffer the consequences of this line. The studies released in March, 2009, just months after the MTEP 2008 approval by MISO, is close enough in time to infer that MRO, MISO and the Applicants knew or should have known of that the Hampton-La Crosse transmission line could put the system at risk, and they failed to investigate and failed to disclose until after approval in MTEP 08.. It is this perfect storm of transmission organizations and owners in their push for realization of economic benefits that has resulted in violations of NERC criteria and specifically the approval of the CapX 2020 Hampton-La Crosse transmission line without regard for the electrical consequences.

MRO's reliability mandate is based on its adoption of North American Electric Reliability Corporation (hereinafter "NERC") Reliability Standards, procedures and processes. The MRO procedures, processes and practices are incorporated into the Reliability Plans of the Midwest Independent Transmission Service Operator. From MRO's Bylaws:

... a Regional Entity within the NERC structure for the purpose of preserving and enhancing electric service reliability, adequacy and security in the Corporate Region and other interconnected regions for the benefit of all end-users of electricity and all entities engaged in providing electric services in the Corporate Region.

In support and furtherance of its purpose, the Corporation's responsibilities shall include, but not be limited to: (1) proposing Reliability Standards, including regional variances or regional Reliability Standards required to maintain and enhance electric service reliability, adequacy and security in the Corporate Region; (2) assessing compliance with and enforcing Reliability Standards, to the extent authorized by applicable agreements and/or law governing a Member's membership in the Corporation, (3) conducting investigations and data analysis on disturbances, system events, and related matters; (4) conducting long-term assessments of reliability within the Corporate region' and (5) other related activities.

In furthering the electric service reliability responsibilities, members have obligations and agree to comply with applicable reliability standards and NERC rules.

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- Adequacy — is the ability of the electric system to supply the aggregate electric power and energy requirements of the electricity consumers at all times, taking into account scheduled and reasonably expected unscheduled outages of system components.
- Operating Reliability — is the ability of the electric system to withstand sudden disturbances such as electric short circuits or unanticipated loss of system components.

NERC 2011 Long Term Reliability Assessment, p. 491, Appendix III: Reliability Concepts Used in this Report. System instability puts the ability of the system to supply to electricity consumers at risk. The point of the NERC criteria and standards are to assure that additions to the electrical system do not have adverse impacts on system performance.

A. MRO, and-MISO and Applicants have not addressed the system instability and electrical consequences of a radial 345kV transmission line.

The CapX 2020 Hampton-La Crosse transmission project evaluation by MISO focused on economics, and ignored the inherent electrical consequences and reliability concerns of a radial 345kV transmission line. Months after MTEP 08 was released, a press release announced a report that gave MRO and MISO active and constructive notice that the CapX 2020 Hampton-La Crosse transmission line would cause system instability and put the transmission system at

risk. It also demonstrated that the economic benefits and increased transfer capacity would not be realized with just the Hampton-La Crosse transmission line – it required an extension to the east. Instead of rejecting the Hampton-La Crosse transmission line as proposed by the Applicants, MISO approved the project and, in the state proceedings, and as late as 2012, defended CapX2020 during state application process using 2004 demand data, knowing it was outdated and overstated, and misleading regulators in consistent understatements of demand reducing potential of energy efficiency, demand response and distributed generation. MRO has also taken no action to correct the stability problems despite its reliability mandate and authority.

1. Xcel/GRE Press Release

The Hampton-La Crosse line was proposed to MISO and incorporated into and approved in the MTEP 08, issued in November, 2008.⁵ While MTEP 08 makes claims that it “includes identification of projects required to maintain reliability,”⁶ there are no transmission reliability electrical studies included or appended to MTEP 08. The claimed reliability studies are “global reliability testing” focused on “Reliability Needs – Transmission Capacity” with no itemization of claimed problems and demonstration that roughly 8-1, the majority of outage events are “multiple facility outage events.”⁷

In April, 2009, Xcel Energy and GRE issued a press release stating that:

The studies also found that further upgrades in Minnesota and the Dakotas (beyond the 230-kilovolt line upgrade) will not provide significant benefit prior to installation of a high-voltage transmission line between the La Crosse, Wis., area and the Madison, Wis., area. Without a line to the east of Minnesota, the transmission system will reach a “tipping point” where reliability is compromised, according to the studies.

⁵ MTEP 08 is available online at <https://www.midwestiso.org/Library/Repository/Study/MTEP/MTEP08/MTEP08%20Report.pdf>

⁶ See e.g., MTEP 08, p. 1.

⁷ Id., p. 9.

Xcel Energy Press Release, April 3, 2009⁸. The primary report referred to in the April 3, 2009 Press Release is the “Corridor Study” or the “Final Report – Southwest Twin Cities – Granite Falls Transmission Upgrade Study & Minnesota RES Update Study,”⁹ the “Companion Report for the Southwest Twin Cities – Granite Falls Transmission Upgrade Study Technical Report.” The system instability inherent in adding a line to La Crosse is verified in other documents and in testimony in the Wisconsin CPCN proceeding.

2. Corridor Study – Southwest Twin Cities – Granite Falls Transmission Upgrade Study & Minnesota RES Update Study

The Final Report – Southwest Twin Cities – Granite Falls Transmission Upgrade Study & Minnesota RES Update Study, prepared by the Minnesota Transmission Owners and entered by Xcel Energy as an Exhibit in the Wisconsin CPCN proceeding, is the study referred to in the April 3, 2009 press release. Most importantly, this study was the first to consider the cumulative electrical impacts of the CapX 2020 transmission build-out. The study reveals that instead of relieving “congestion,” it moves congestion to the end of the line, in La Crosse. The studies state that there must be an extension of the line from La Crosse to the 345 kV system near Madison, i.e., Columbia, West Middleton, etc. This was not contemplated in MTEP 08.

Supporting Facilities for Corridor Upgrade –

- *One outcome of studying a Midwest ISO market sink scenario is that the system requires additional facilities to deliver power east from LaCrosse, Wisconsin to the rest of the Midwest ISO footprint during low load and high wind periods in the Minnesota and Dakota areas. The Corridor Upgrade facility would then achieve its full potential in the Midwest ISO market dispatch.*
- *The Twin Cities metro sink scenario showed that in order to sink as much as 2000 MW of generation from the west to the Twin Cities, many metro area electric generation units must be shut down to allow the imported generation to remain online. To enable this new generation to be sunk in the Twin Cities metro and*

⁸ Xcel Energy Press Release available online: <http://nocapx2020.info/wp-content/uploads/2011/05/addk-exhibitf-sandok4-3-09.pdf>

⁹ Final Report – Southwest Twin Cities – Granite Falls Transmission Upgrade Study available online at <http://www.minnelectrans.com/documents/MTO-Study-Reports.pdf>

maintain reliable operation requires a significant list of metro area transmission upgrades.

Tipping Point in Transmission System – Following the addition of the Corridor upgrade (and associated underlying system upgrades required with a Twin Cities Metro sink scenario) any future transmission or generation capacity additions will require a facility from LaCrosse to Madison, Wisconsin area. In other words, without a line to the east of LaCrosse the system will reach a tipping point, where additional transmission and generation capacity additions cannot be accommodated due to the need to keep Twin Cities generation online for steady state and dynamic system stability.

Id., p. 9-10.

The studies for the CapX 2020 Hampton to La Crosse transmission project and subsequent Corridor and RES Update studies, a termination in Madison to attain capacity and “ensure reliable operation” was a foundational assumption. The impossibility of routing additional capacity into the Twin Cities without reliability impacts and need for an eastward flow is reiterated:

Wisconsin Transmission Limits

In addition to this upgrade, a new high-voltage transmission facility is necessary between La Crosse and eastern Wisconsin to ensure reliable operation and enable full dispatch of new generation resources. The Corridor and RES Update Studies assumed a termination in the Madison area. Southern Minnesota currently only has one high voltage tie between Minnesota and eastern Wisconsin (the King - Eau Claire - Arpin 345 kV line). Together with the Corridor upgrade, addition of this facility adds as much as 1600 MW of additional capacity to the system - a total of 3600 MW of new generation delivery capability. The need for a new line to the east is consistent with the findings of the Minnesota Wind Integration Study, the study upon which the Minnesota legislature relied when drafting the RES legislation.

Twin Cities Generation Sink Scenario

Another contributing factor is the Twin Cities generation sink scenario studied in the Corridor Study. Importing approximately 2000 MW of generation into the Twin Cities without additional outlet capacity to the east, as was done in the Corridor Study, required significant Twin Cities generation resources to be turned off. This result is significant because any increase beyond 2000 MW will require generation at Sherburne County to be shut down. With its restart time measured in days, this would make Sherburne County unable to respond to fluctuations in

energy demand and wind generation. This scenario is not recommended due to a decrease in reliability that would result.

Id., p. 13 (emphasis added). Yet this is the scenario that exists with the addition of the CapX 2020 Hampton-La Crosse transmission line.

In addition to the delayed and arcane utility disclosure of systemic instability and congestion without an extension of the CapX 2020 build-out only as approved, the report states that a new high-volt age transmission facility is necessary between La Crosse and eastern Wisconsin to achieve the supposed benefits of the approved system addition, to ensure reliable operation and to enable full dispatch of generation resources. The proposed and approved build-out would not work as proposed, and instead of improving the system, it put it at risk and did not deliver the espoused economic reliability benefits associated with claimed relief of congestion and increased power transfers that cannot be achieved.

In addition to the reliability issues, the failure to present the phased and connected transmission lines together violates Federal NEPA law prohibiting the segmentation of dependent projects.

3. Western Wisconsin Reliability Study

In the Western Wisconsin Transmission Reliability Study, dated September 20, 2010, the basis for the study is that the Hampton-Rochester-LaCrosse transmission project does not, on its own, provide significant increase in transfer capacity. This project requires additional line from La Crosse to the east to provide economic benefits, transfer capability and to address the electrical limitations. Without an extension, project is a radial tie to LaCrosse subject to voltage instability:

The west to east transfer capability of the existing transmission facilities through the Minnesota-Wisconsin Export (MWEX) interface is presently limited due to voltage stability and transient voltage recovery limitations.

WWTRS p. 6¹⁰. This theme is found throughout the study:

The western Wisconsin area can be impacted by heavy power flows in various directions; particularly well noted is the west to east flow bias. These flow biases cause additional stress to the area's transmission network. The west to east transfer through the Minnesota-Wisconsin Export (MWEX) interface is currently limited due to voltage stability and transient voltage recovery limitations. Wind-powered generation has been and will continue to be added in the upper Midwest to meet the state Renewable Portfolio Standard (RPS) requirements in the geographical region and beyond. These additions will most likely increase the levels of the west to east flows, particularly during off-peak load periods.

Id., p. 14; see also p. 44:

Voltage stability is an important issue for the western Wisconsin study area. Currently, the Minnesota-Wisconsin Export interface (MWEX) is limited by voltage stability and transient low voltage recovery. The voltage stability analysis demonstrates the robustness of the system with each transmission option and compares between the options in respect to voltage stability characteristics under increasing west to east transfers.

4. Capacity Validation Study

The Capacity Validation Study (hereinafter “CVS”) was prepared by the Minnesota Transmission Owners and was released on March 31, 2009, days before the Xcel press release disclosing system instability.¹¹ The Capacity Validation Study was the first study to consider the cumulative impacts of the entire CapX 2020 Group 1 transmission projects:

Another finding of the study is that the CapX2020 Group I projects appear to provide more outlet capability than had previously been assumed. This increase in outlet capability is due to the projects being studied on combined basis than on an individual, standalone basis. The combination of transmission provides more transfer capability. The effort to move these projects through the regulatory and construction processes should continue as scheduled. Each of the CapX2020 Group I projects should also be built with the capability to be double circuited (upsized).

¹⁰ The WWTRS link on the ATC website is no longer functional. The WWTRS can be found online at <http://nocapx2020.info/wp-content/uploads/2011/11/atc-xmsnstudy-pcdocs-3993093-v1-xcella-crosseattachment-52b-1-nocapx2.pdf>.

¹¹ The Capacity Validation Study is available online at <http://www.minnelectrans.com/documents/capacity-study/cvsreport.pdf>

CVS, p. 8-9. Achieving the desired transfer capacity increase requires line extending to Madison and 345kV ring. CVS p. 9.

For any case that does not include the La Crosse – West Middleton 345 kV transmission line..., an overload of the King – Eau Claire or the Eau Claire – Arpin 345 kV line before any other criteria are met, is a stopping point.

Id.

From the Capacity Validation Study:

Further results of the CVS indicate a new transmission line is needed east of Minnesota. In nearly every transmission scenario which sinks to the Midwest ISO footprint, the King – Eau Claire line emerges as the limiting element. The only scenario in which this line is not the limiting element is when a parallel line exists between La Crosse, Wisconsin and the Madison, Wisconsin area. From the study results, each scenario which contains a new La Crosse – Madison line provides more transfer capability when sinking to the Midwest ISO than any of the scenarios without this new line. The CVS examined the line as a single circuit 345kV only, but it is possible a double circuit line would be justified.

p. 9-10. See “Stopping Results,” Id., p. 39-40;

Midwest ISO Sink

The Midwest ISO sink was comprised of units in the eastern portion of the Midwest ISO footprint. The Midwest ISO sink represents the delivery of wind energy to the greater Midwest ISO market. The Midwest ISO sink does not represent physical delivery to any specific entity or location. It is more representative of a merit order dispatch in which the low cost baseload units in the region are online along with the wind generation.

The Midwest ISO sink is the most limiting sink due to the low number of high voltage connections between the western and eastern portions of Midwest ISO. Currently, there exists only two 345 kV lines between Minnesota and Wisconsin and only two 345 kV lines between Iowa and Illinois. One of the 345 kV lines, between King (Minnesota) and Eau Claire (Wisconsin), is the limiting element in most of the Midwest ISO sink transmission scenarios. The only scenarios in which the King – Eau Claire line is not a limiting element is when a line from La Crosse, Wisconsin to the Madison, Wisconsin (project 2g of the projects studied) area is included. All transmission using the Midwest ISO sink and transmission scenarios with the La Crosse – Madison line have a significantly larger amount of transfer capability than transmission scenarios without this line.

Of the scenarios studied, the Midwest ISO sink is the most realistic. The Midwest ISO sink scenario most closely matches how Midwest ISO would perform a deliverability test. The deliverability test would be performed by

sending the output of a new generator across the entire Midwest ISO footprint. The Midwest ISO sink analysis also reflects the unlikelihood that wind generation will realistically be able to interconnect to the system with existing baseload generation turned off. In the interconnection studies, the generation owner would have to demonstrate that both the new generation and the existing generation can both generate simultaneously, without impacting the firm rights of the existing generation³⁰. Also, by ensuring the system is capable of sinking to the

Midwest ISO market, one can be assured the overall system will be dispatched in the most economical manner and will not be limited by congestion on the transmission system.

Id., “Midwest ISO Sink” p. 50-51; “Priority Transmission Projects” p. 51-53

This instability inherent in the radial extension of the 345kV system is also reflected in the Capacity Validation Study, which states that “a line to the east is needed,” and a line to Madison is assumed. CVS p. 8-9, see also p. 51.

5. Supplemental Need Study

Xcel Energy published a Supplemental Need Study, dated August 2011¹², for the CapX 2020 Hampton-La Crosse CPCN docket in Wisconsin. This study also demonstrated that the Hampton-LaCrosse project, a radial line to LaCrosse, will not address the congestion complained of. For example, the “Congestion-Based ones Modeled in 2014” cover much of Minnesota. SNS Study, p. 24. The map shows that southeast Minnesota and all of Wisconsin, with the exception of Milwaukee, is congestion free. A line from Minnesota to LaCrosse will only bring the Minnesota congestion, and its associated ratepayer costs, to LaCrosse and rural communities in the area. Without the addition of a line from LaCrosse to Madison, expect system instability “to ensure reliable operation and enable full dispatch of new generation resources.”¹³ The Stability Assessment showed that system stability was at risk and “significant new reactive

¹² Supplemental Need Study available online at <http://nocapx2020.info/wp-content/uploads/2012/02/xcel-supplemental-need-study-dated-august-2011.pdf>

¹³ Id. at 13.

capability will be necessary as variable and intermittent generation sources increase. This is due in large part to generation being located a significant distance from load centers.” Id. p. 14.

The planning for the CapX 2020 Hampton-La Crosse line focused on economic benefits and did not comply with standards and criteria essential for reliability.

6. Studies demonstrate instability and inability of project to perform as claimed

These studies that address the instability and the inability of the project to provide the electrical or economic benefits touted by the Applicants. The inherent problems of extending transmission to La Crosse were ignored by those performing and overseeing the MTEP 08 evaluation for this project. The approval of this project, and the CapX 2020 Group 1 project was made without consideration of the cumulative impacts of this significant addition to the transmission system until the Capacity Validation Study, issued in 2010, long after MTEP 08. The largest transmission project in history is a violation of transmission standards and criteria and the Commission’s mandate to MRO and MISO to protect the reliability and system security of the transmission system. Developing a plan that requires a second project violates not only electric reliability standards but federal regulations regarding environmental impact and segmentation. MISO approved the CapX 2020 Hampton-La Crosse transmission project. MRO has failed to act and Applicants forwarded a project without transparency and full disclosure. Furthermore, Applicants forwarded an inherently flawed project using the benefits of a not-proposed second project that would fix the flaws while not presenting the corresponding costs.

B. Applicants, MRO and MISO focused on capacity expansion, and ignored system reliability, at the expense of grid security

Regarding the major new projects, the MTEP 08 notes that “[t]here of these projects are in Minnesota and are known as the Capacity Expansion (CapX) 2020 Group 1 Projects...”¹⁴ It is not disclosed that the Capacity Expansion (CapX) projects are predicated on a 2004 projection of a 2.49% annual increase in demand:

In developing this long range plan for major new construction, the CapX 2020 technical team considered two potential scenarios for growth in electricity demand:

- 1. Anticipated load growth of 2.49 percent annually from 2009 through 2020, for an increase of 6,300 megawatts. This is based on load projections for utilities with customers in Minnesota, published by the Mid-Continent Area Power Pool (MAPP) in the 2004 MAPP Load and Capability Report and in recent utility resource plan filings. Load growth of 6,300 MW would require over 8000 MW of new generation, given losses that occur when transmitting.*
- 2. Slower load growth – about two-thirds of the published load projections – of 4,500 MW.*

See p. 1, CapX 2020 Technical Update: Identifying Minnesota’s Electric Transmission Infrastructure Needs, October 2005.¹⁵

This Hampton-La Crosse transmission project, based on 2004 projections, was approved in MTEP 08, issued in November, 2008, and begun much earlier, at roughly the same time as the 2007 economic crash. Today, in 2013, we all know that level of demand did not occur. This was also known in 2012 when MISO testified in support of the line in front of the WI PSC but did not make transparent that the project was premised on eight year old and vastly overstated demand numbers. We know that there is a gross oversupply of electricity and that the price of electricity is at a near all-time low.

MTEP 08 presents the [Hampton] to La Crosse 345 kV line as a Baseline Reliability Project claiming a “lengthy list of NERC contingency based violations that, without this project,

¹⁴ Id., p. 4.

¹⁵ Item 5, NoCapX/CETF Item List, Wisconsin PSC Docket 05-CE-136, CapX 2020 Hampton-La Crosse Transmission Project. http://www.psc.wi.gov/apps35/ERF_view/viewdoc.aspx?docid=160027 Also in CapX 2020 Minnesota Certificate of Need Application, Appendix A-1, PUC Docket 06-1115.

will result in severe overloads in some cases within the five year planning horizon.” MTEP does not consider the impact of equal investments in non-transmission projects relative to their cost-effectiveness or ability to address NERC contingency violations. From MTEP 08:

Twin Cities to La Crosse 345kV line

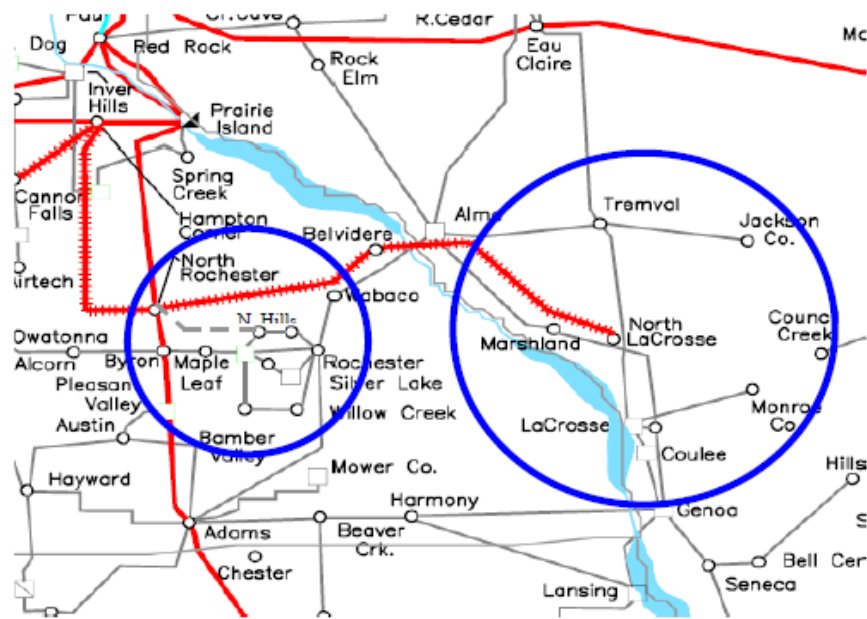


Figure 1.3-2: Twin Cities to La Crosse 345kV Line

This project has an estimated cost of \$360 million, which is eligible for cost sharing as a Baseline Reliability Project, and extends 345kV transmission system support to growing load areas of Rochester Minnesota and La Crosse Wisconsin. Each of these areas has been experiencing load growth that will outstrip the ability of the existing lower voltage systems to reliably supply the loads. The proposed project resolves these reliability issues by providing additional transformation in the Rochester area and by introducing 345kV supply into the La Crosse area, relieving heavily loaded 161kV class lines in each area. Similar to the issues driving the Fargo line described above, this line is needed to resolve a lengthy list of NERC contingency based violations that, without this project will result in severe overloads in some cases within the five year planning horizon.

MTEP 08, p. 6.

The CapX 2020 Hampton-La Crosse transmission project was one of the CapX Group 1 projects and others that were evaluated on economic criteria, considering “constraint mitigation” based on “economic benefit savings” projected collectively as Load Cost Savings of 2021 of \$2,169,980,934.

Base Case with Binding Relief Projects - Base Case	70%APC+30%LMP RECBII Type Benefit Savings (\$) 2021	Adjusted Production Cost Savings 2021	Load Cost Savings 2021
MISO	1,234,227,919	833,190,912	2,169,980,934
MICH	136,335,826	(9,378,875)	476,336,794
PJM	316,732,668	(12,987,769)	1,086,080,355

MTEP 08, p. 254.

This potential for significant economic benefit is supported by ICF’s 2007 Independent Assessment of Midwest ISO Operational Benefits.¹⁶ But economic benefit is not reliability, nor was the economic scenario appropriately done taking into account accessible costs and the impact of equal investment into alternatives. The bottom line is that congestion is an economic concept, not reliability.

The market benefits of a transmission expansion build-out are clear:

This analysis was designed to focus on a subset of operational benefits available from Day-2 RTO operation which are quantifiable using commercially available models that simulate unit commitment and dispatch of electric generation. The focus was on production cost savings associated with centralized operations, and hence, primarily reflects estimation of the displacement of relatively more expensive generation with relatively less expensive generation made possible by centralized operations. In most cases the simulation indicated the potential displacement of gas-fired generation with coal-fired generation. This inter-fuel optimization is particularly important in the Midwest because the natural gas generation fleet includes a disproportionate level of expensive gas-fired peaking units as opposed to intermediate or less costly gas-fired combined cycle or gas-steam facilities. Further, Midwest ISO coal plants have very low operating costs even compared to other US coal-fired power plants. Thus, any displacement of natural gas generation with coal generation can greatly decrease operating costs. Put another way, the use of a gas plant when somewhere else inside or outside of the Midwest ISO a coal plant with spare capacity and the needed transmission is available to displace the gas plant would increase costs significantly. As such, an important goal of grid optimization is to minimize these occurrences.

¹⁶ Attachment A, Item List, Item 15, ICF – Independent Assessment of MISO Operational Benefits, February 27, 2007. ICF’s Benefits study is also available online at <http://www.icfi.com/insights/reports/2007/independent-assessment-of-midwest-iso-operational-benefits> ICF’s report finds “RTO operational benefits are largely associated with the improved ability to displace gas generation with coal generation, more efficient use of coal generation, and better use of import potential. These benefits will likely grow over time...” ICF, p. 14.

ICF – Independent Assessment of MISO Operations Benefits, p. 9, NoCapX/CETF Item 15, ERF 160024.

Respondents/Applicants/Owners admit in state “need” dockets that the project is “needed” because it provides increased transfer capability, but the Hampton-Rochester-LaCrosse transmission project does not, on its own, provide significant increase in transfer capacity. This project requires additional line from LaCrosse to Madison to provide transfer capability. The current anticipated cost for this line is over \$500 million, making the complete project triple the approved Wisconsin transmission expansion. Without it, the project is only a radial tie to LaCrosse subject to voltage instability:

The west to east transfer capability of the existing transmission facilities through the Minnesota-Wisconsin Export (MWEX) interface is presently limited due to voltage stability and transient voltage recovery limitations.

WWTRS p. 1, 9; see also CVS p. 8-9; SNS p. 14.

Transfer capacity increase requires line extending to Madison and 345kV ring. CVS p. 9. “For any case that does not include the LaCrosse – West Middleton 345 kV transmission line..., an overload of the King – Eau Claire or the Eau Claire – Arpin 345 kV line before any other criteria are met, is a stopping point. Id., p. 39; see also p. 51 (a line to the east is needed).

This project alone does not provide significant transfer capability – it brings the electricity to the western edge of Wisconsin, to La Crosse, but that is all. For significantly increased transfer capability, the extension from La Crosse to Madison is required. There is no basis for MISO to approve the CapX 2020 Hampton-La Crosse transmission line for the purpose of significantly increasing transfer capacity.

a. HAMPTON-LA CROSSE AND BADGER-COULEE ARE SEPARATE PROJECTS, APPROVED YEARS APART

Xcel, quoting ATC in its Answer to a recent ATC Complaint,¹⁷ argues that “The Twin Cities – La Crosse and the La Crosse – Madison transmission lines “are separate and distinct transmission lines, no different than any other separate and distinct transmission lines that at some point interconnect as part of the transmission network.” Just because they interconnect “does not mean one line is an extension of the other.”¹⁸

In approving the CapX 2020 Hampton-La Crosse transmission line in MTEP 08, MISO agreed with Xcel that the Hampton-La Crosse and Badger-Coulee projects are separate. MISO, MRO and the Applicants cannot now say they are one. Because these are separate projects, proposed and approved independently of each other, not dependent, CapX2020 violates NERC stability requirements. Federal environmental law regarding segmentation of connected and dependent projects has been violated, because grid stability and economic congestion oriented benefits rely on the addition of a second, dependent line.

V. CONCLUSION

Citizens Energy Task Force and Save Our Unique Lands requests that the Federal Energy Regulatory Commission order that the MTEP 08 addition of the Hampton-Rochester-La Crosse transmission line is prohibited because electrical impacts of the addition of this project to the grid were not considered, and that instead of improving the reliability of the system, it contributes to and/or causes electrical system instability, that the Midwest Reliability Organization (MRO) has neglected its duty to preserve the reliability of the system, and that the

¹⁷ FERC Docket EL-13-09, Xcel Energy Answer, p. 1.

¹⁸ Xcel’s Answer to ATC Complaint, FERC Docket EL-13-9-000, quoting ATC Arguments in Minnesota Public Commission Dockets, citing *In the Matter of the Application for a Route Permit for the CapX2020 Hampton-Rochester-La Crosse High Voltage Transmission Lines*, MPUC Docket No. E-002/TL-09-1448 (“*Minnesota Route Permit Proceeding*”) RESPONSE TO OBJECTION OF AMERICAN TRANSMISSION COMPANY LLC AND ITS CORPORATE MANAGER, ATC MANAGEMENT INC. at pp. 3-4 (May 31, 2011) (“ATC Route Permit Objection”). *Minnesota Route Permit Proceeding*, PETITION TO INTERVENE OF AMERICAN TRANSMISSION COMPANY LLC AND ITS CORPORATE MANAGER, ATC MANAGEMENT INC. at p. 3 (May 2, 2011) (“ATC Route Permit Intervention”).

Commission Order revocation of the Midwest Independent Transmission Service Operator (MISO) approval of the CapX 2020 Hampton-La Crosse transmission project because the addition of the Hampton-Rochester-La Crosse transmission line contributes to and/or causes system instability.

Additional information required by 18 CFR 386.206(b)

- The issues presented are not pending in any existing Commission proceeding or a proceeding in any other forum in which the Complainant is a party.
- Supporting documents:

Midwest Transmission Expansion Plan (MTEP) 08

<https://www.midwestiso.org/Library/Repository/Study/MTEP/MTEP08/MTEP08%20Report.pdf>

Xcel Energy Press Release, April 3, 2009

<http://nocapx2020.info/wp-content/uploads/2011/05/addk-exhibitf-sandok4-3-09.pdf>

Final Report – Southwest Twin Cities – Granite Falls Transmission Upgrade Study

available online at <http://www.minnelectrans.com/documents/MTO-Study-Reports.pdf>

Western Wisconsin Transmission Reliability Study

<http://nocapx2020.info/wp-content/uploads/2011/11/atc-xmsnstudy-pdocs-3993093-v1-xcella-crosseattachment-52b-1-nocapx2.pdf>.

Capacity Validation Study

<http://www.minnelectrans.com/documents/capacity-study/cvsreport.pdf>

Supplemental Need Study

http://nocapx2020.info/wp-content/uploads/2012/02/xcel-supplemental_need_study-dated_august-2011.pdf

CapX 2020 Technical Update: Identifying Minnesota's Electric Transmission Infrastructure Needs, October 2005

http://www.psc.wi.gov/apps35/ERF_view/viewdoc.aspx?docid=160027

- Thus far, these matters have been decided in MISO MTEP committees, in which participation by Complainants is not allowed. Alternate Dispute Resolution has not been used, and it is possible that alternative dispute resolution could successfully resolve the complaint.

- Form Notice follows Complaint.

Respectfully submitted,



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**UNITED STATES OF AMERICA
FEDERAL ENERGY REGULATORY COMMISSION**

**Citizens Energy Task Force and
Save Our Unique Lands,**

Complainants,

v.

Docket No. EL13-_____

**Midwest Reliability Organization (MRO);
Midwest Independent Transmission System
Operator, Inc. (MISO); and utilities Xcel Energy,
Inc. (Northern States Power Company, a
Wisconsin Corporation, Northern States Power
Company, a Minnesota Corporation, d/b/a Xcel
Energy); Great River Energy, a Minnesota
Cooperative Corporation; Dairyland Power
Cooperative, a Wisconsin Cooperative
Corporation; Wisconsin Public Power Inc., a
Wisconsin corporation; as Applicants for the
CapX 2020 Hampton-La Crosse Transmission Project.**

CERTIFICATE OF SERVICE

Carol A. Overland certifies that on March 1, 2013, I hereby certify that a true and correct copy of the foregoing document was served by electronic mail upon respondents and all others that maybe be affected by the complaint, as required by FERC's Regulations.

Dated: March 1, 2013



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**UNITED STATES OF AMERICA
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**Citizens Energy Task Force and
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**Midwest Reliability Organization (MRO);
Midwest Independent Transmission System
Operator, Inc. (MISO); and utilities Xcel Energy,
Inc. (Northern States Power Company, a
Wisconsin Corporation, Northern States Power
Company, a Minnesota Corporation, d/b/a Xcel
Energy); Great River Energy, a Minnesota
Cooperative Corporation; Dairyland Power
Cooperative, a Wisconsin Cooperative
Corporation; Wisconsin Public Power Inc., a
Wisconsin corporation; as Applicants for the
CapX 2020 Hampton-La Crosse Transmission Project.**

NOTICE OF COMPLAINT

(February 28, 2013)

Take notice that on February 28, 2013, pursuant to sections 206 and 206 of the Federal Power Act (FPA) and Rule 206 of the Rules of Practice and Procedures of the Federal Energy Regulatory Commission (Commission), 18 CFR 385.206, Citizens Energy Task Force and Save Our Unique Lands (SOUL of the Kickapoo) seeking an order that the MTEP 08 addition of the Hampton-Rochester-La Crosse transmission line is prohibited because electrical impacts of the addition of this project to the grid were not considered, and that instead of improving the reliability of the system, it contributes to and/or causes electrical system instability, that the Midwest Reliability Organization (MRO) has neglected its duty to preserve the reliability of the system, and that the Commission Order revocation of the Midwest Independent Transmission Service Operator (MISO) approval of the CapX 2020 Hampton-La Crosse transmission project because the addition of the Hampton-Rochester-La Crosse transmission line contributes to and/or causes system instability.

The Complainant certifies that copies of the complaint were served on the contacts for the Respondents as listed on the commission's list of Corporate Officials and on parties and the regulatory agencies the Complainants reasonably expect to be affected by this complaint.

Any person desiring to intervene or to protest this filing must file in accordance with Rules 211 and 214 of the Commission's Rules of Practice and Procedure (18 CFR 385.211, 385.214). Protests will be considered by the Commission in determining the appropriate action to be taken, but will not serve to make protestants parties to the proceeding. Any person wishing to become a party must file a notice of intervention or motion to intervene, as appropriate. The Respondent's answer and all interventions, or protests must be filed on or before the comment date. The Respondents answer, motions to intervene, and protests must be served on the Complainants.

The Commission urges electronic submission of protests and interventions in lieu of paper using the "eFiling" link at <http://www.ferc.gov>. Persons unable to file electronically should submit an original and 14 copies of the protest or intervention to the Federal Energy Regulatory Commission, 888 First Street N.E., Washington, DC 20426.

This filing is accessible on-line at <http://www.ferc.gov>, using the "eLibrary" link and is available for review in the Commission's Public Reference Room in Washington, DC. There is an "eSubscription" link on the web site that enables subscribers to receive email notification when a document is added to a subscribed docket(s). For assistance with any FERC Online service, please email FERCOnlineSupport@ferc.gov, or call (866) 208-3676 (toll free). For TTY, call (202) 502-8659.

Comment Date: 5:00 p.m. Eastern Time on (insert date)

Kimberly D. Bose
Secretary