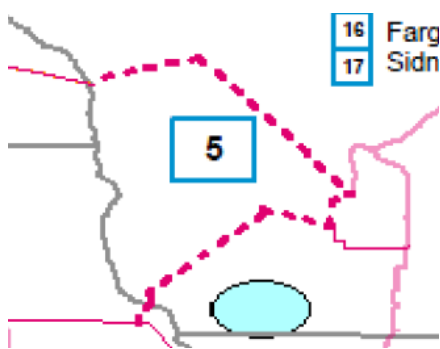


## Who needs transmission? Wants it? Why?

The Wisconsin Public Service Commission, as part of its Certificate of Public Convenience and Necessity decision, will determine whether the Badger Coulee (“BC”) transmission project is “needed,” and if “needed,” the PSC will determine its route. The environmental review will address questions of impacts regarding need, cost, and alternatives.

What is the “need” for this project? That question must be answered because we need to know “alternatives to what?” ATC, the original proposer, is a transmission only company which buys, builds and operates transmission for profit. It does NOT provide an essential service, and it does NOT have service territory or retail customers. This project is transmission for profit, and to benefit those who generate, market, and buy electricity regionally. What’s in it for Wisconsin ratepayers? That’s the key question.



Badger Coulee is roughly the northern ½ of MVP 5, a Multi Value Project (MVP). The MISO MVP Portfolio was developed to aid marketing electricity for **private profit**. This is just one of 17 “MVP” projects **which together, as a package**, when added to the 345kV system, would provide “benefits.”

What’s a benefit? Marketing surplus generation; selling to an area not previously accessible; decreased production costs by utilizing existing

generators (coal & nuclear) which also lowers fixed costs; real time economic dispatch of constantly running baseload generators (coal & nuclear) for peaking needs; and use of baseload generators for peaking displaces higher cost generation (gas).

The economic benefit (PROMOD) modeling includes **ALL 17 PROJECTS**, and not just ITC’s MN/IA line. The “benefits” are dependent on all 17 projects, the \$5.2 billion cost of **ALL** 17 MVP projects must be considered, and also the percentage to be paid by ratepayers!

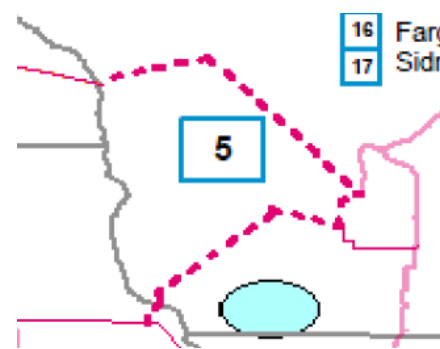
A number of intervenors support this project, including Minnesota Center for Environmental Advocacy, Fresh Energy, Izaak Walton League, Wind on the Wires, Clean Wisconsin, Citizens Utility Board and Clean Wisconsin – they are participants in RE-AMP, organizations and funders promoting the transmission build out. Other RE-AMP participants such as Center for Rural Affairs are on a media tour. Why support it?

Besides their funding interests, whose interests are they representing? Not ratepayers or landowners. These orgs are paid. Their RE-AMP grants agreements specify that they will promote transmission, just as RE-AMP orgs supported coal gasification. You’ll hear “it’s for wind,” but under FERC, transmission can’t discriminate between types of generation. Adding transmission will not displace coal because it adds capacity, it supports coal with 50 year infrastructure, and does not shut down any coal generation. Adding transmission provides “a way forward for coal,” for displacement of natural gas by coal. Not one state renewable mandate requires shut down of coal, only additions of renewables. If coal were shut down, there would be capacity for wind! Support of transmission instead enables continuation of coal generation. It’s not about wind.

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## Send your Scoping Comments by July 15

### Tell them what they need to address in the EIS!

First, **DEFINE THE NEED!** The EIS must do more than parrot Xcel/ATC's application. High voltage transmission has high impacts. What are the climate and environmental costs? Are alternatives considered, as required by Wisconsin Environmental Policy Act and Wisc. Stat. §1.1? Alternatives to a well-defined specific need or an unquestioning acceptance of the applicant's claims? Does the EIS adequately compare alternatives with the project as proposed in light of Wisconsin's energy hierarchy – conservation first? What alternatives become lost opportunities if this project is built?

When the DEIS looks at costs, and in the cost benefit analysis, it should consider costs to Wisconsin and benefits to Wisconsin – and also consider costs to Wisconsin for benefits targeted elsewhere! What are the socioeconomic considerations, what policies are promoted? What are the environmental impacts of this and the 17 MVP projects?

- Xcel and ATC benefit through providing transmission service for private profit.
- Generators selling into the grid benefit from higher prices for electricity, because they can ship electricity to locations where prices are higher - further east.
- Generators in ND/SD benefit by marketing surplus generation to eastern markets.
- Recipients further east benefit because they'll pay less for wholesale electricity, electricity that would otherwise be sold here. Will retail ratepayers benefit?
- Where's the benefit to Wisconsin ratepayers? Wisconsin utilities?
- Are any "benefits" realized if any of the 17 MVP projects are not built?

System Alternatives? The Commission should consider alternatives, individually and in combination -- efficiency and conservation, demand side management, and distributed generation, i.e., on site solar. HVTL grid versus microgrid and distributed generation?

Phased and connected actions, cumulative impacts – this connects to CapX 2020 and is part of MVP 5, the MISO 17 project portfolio! What's the impact of a 17 project MVP package? Enables burning coal by marketing "surplus generation" from the Dakotas?

Disclose the expected and maximum capacity of the line and report EMF levels for this full range of capacity! Address corona, ultra violet, and x-ray frequencies and cancer!

How will a private non-utility obtain any land to expand the right of way? A private purpose doesn't qualify for eminent domain!

### Scoping Comments due on July 15, 2014

Send to PSC's Environmental Coordinator: [marilyn.weiss@wisconsin.gov](mailto:marilyn.weiss@wisconsin.gov)

To see the full docket, go to [www.psc.wi.gov](http://www.psc.wi.gov), scroll down, and search for docket 05-CE-142.

*Carol A. Overland, Attorney at Law, [overland@legalectric.org](mailto:overland@legalectric.org), representing*

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*Visit [www.cetf.us](http://www.cetf.us) and [www.nocapx2020.info](http://www.nocapx2020.info)*

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