

BEFORE THE
PUBLIC SERVICE COMMISSION OF WISCONSIN

Joint Application of American Transmission Company LLC and Northern States Power Company-Wisconsin, as Electric Public Utilities, for Authority to Construct and Operate a New Badger-Coulee 345 kV Transmission Line from the La Crosse Area, in La Crosse County, to the Greater Madison Area in Dane County, Wisconsin

Docket No.
5-CE-142

**POST-HEARING REPLY BRIEF OF THE
HOLLAND NEIGHBORHOOD PRESERVATION ASSOCIATION**

Intervenor Holland Neighborhood Preservation Association (“HNPA”), by its undersigned attorneys, respectfully submits this Post-Hearing Reply Brief.

DISCUSSION

I. APPLICANTS HAVE WITHDRAWN SUPPORT FOR THE SEGMENT P-WEST OPTION.

In their post-hearing brief, Applicants express a preference for the Segment P-East option if the Northern Route is selected. App. Br. at 20. Therefore, the Commission should give no further consideration of the P-West option.

Applicants’ discussion of the P-West option is relegated to one paragraph on the last page of their brief. *Id.* at 41. While Applicants there make the bare assertion that siting the transmission line through the August Prairie subdivision would “not impose unreasonable impacts” (*id.*), Applicants make no attempt whatsoever to rebut – or even dispute – the findings of the PSC staff in the Environmental Impact Statement (“EIS”) that siting the transmission line through that residential neighborhood would cause severe financial, aesthetic and human impacts and disregard land use plan that local property owners relied upon when they purchased their homes. Instead, Applicants merely cite their meeting with some local residents late in the planning process and act as though that

meeting was enough to make it reasonable to run a transmission line through the heart of a new residential neighborhood. While elsewhere in their brief Applicants ballyhoo the “long and extensive” siting process that began in 2010 (App. Br. at 18), they ignore the fact that many of the homes that would abut the transmission line along Pedretti Street were constructed after the planning process began in 2010. From the perspective of these homeowners and their neighbors, Applicants’ planning process was neither reasonable nor well-executed.

In view of the state of the evidence in the record with respect to the P-West option, Applicants have wisely shifted their focus to the P-East option.

II. IF THE NORTHERN ROUTE IS SELECTED, THE PSC SHOULD REQUIRE TRIPLE CIRCUITING FROM THE BRIGGS ROAD SUBSTATION TO THE HIGHWAY 53/35 INTERCHANGE.

Recognizing that selection of the P-East option will result in two major transmission lines running side-by-side for miles along Highway 53 as it passes through the Town of Holland and the City of Holmen, Applicants have conceded that efforts must be taken to mitigate the huge impact this situation will create. Thus, Applicants have proposed using limited “triple circuiting” in the vicinity of the Prairie View Elementary School and in the vicinity of the apartment complex in Subsegment P12. App. Br. at 28-29.

As discussed in HNPA’s opening brief, this does not go far enough to ameliorate the impacts of constructing the Badger-Coulee line adjacent to the CapX line. HNPA Br. at 9-12. Instead, the Commission should require triple circuiting of the Badger-Coulee and the CapX lines from the Briggs Road Substation to the Highway 53/35 interchange. If this requires reopening the CapX transmission line proceeding in order to authorize co-locating the 345 kV lines, the Commission should not hesitate to do so. In a recent filing, Northern

States Power Company opposed reopening the CapX proceeding to address this important issue, essentially urging the Commission to put on blinders and pretend as though these two power lines have nothing to do with each other. [PSC Ref. #230800](#). In fact, however, these are not wholly separate and unrelated proceedings. From the perspective of residents Holland and Holmen who live near and drive on Highway 53, they are one in the same.

As HNPA observed in its opening brief, the Commission should acknowledge that construction of the CapX line along Highway 53 without taking into account the likelihood that the Badger-Coulee line might be sited in the same corridor – thus raising the issue of co-locating the lines on the same towers – constitutes extremely poor transmission line planning. Applicants boast about their “long and extensive” planning process for the Badger-Coulee line, App. Br. at 18, but that process began two years before the Commission rendered its decision approving the route for construction of the CapX line in May 2012. Applicants clearly knew that the objective of the CapX and Badger-Coulee lines was to bring power from Minnesota into the La Crosse area and then on to Madison. They also knew that selection of a route along Highway 53 to carry the power into La Crosse raised the likelihood that the same corridor might be selected to carry the power from La Crosse to Madison. Someone – whether Applicants or the PSC – should have connected the dots and recognized that it might be wise (and cost-effective) to design the towers for the CapX line to accommodate the Badger-Coulee line, and thereby avoid the need to site two major power line running side-by-side for miles along Highway 53 and through the growing towns of Holland and Holmen.

This problem needs to be fixed. The Commission has the power to do so by reopening the CapX proceeding and doing what should have been done from the outset,

namely, require the construction of transmission towers in the Highway 53 corridor that will accommodate both the CapX and the Badger-Coulee lines. With the CapX line still under construction, it is not too late to fix this very serious problem.

Dated this 13th day of February, 2015.

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