



To: Wisconsin Public Service Commission

From: Fred Clark, Executive Director, Wisconsin's Green Fire

RE: Public comments for Docket 5-CE-146, application for building the Cardinal-Hickory Creek (CHC) high voltage transmission line (hvtl)

25 June 2019

Wisconsin's Green Fire: Voices for Conservation (WGF) is an independent nonpartisan organization. WGF supports the conservation legacy of Wisconsin by promoting science-based management of its natural resources. Our members have extensive experience in natural resource management, environmental law and policy, scientific research, and education and backgrounds in government, non-governmental organizations, universities and colleges, and the private sector. More information about WGF can be found at www.wigreenfire.org.

WGF members have evaluated the application for the proposed CHC high voltage transmission line (hvtl) by the Public Service Commission (PSC) of Wisconsin. WGF requests that the PSC refer to the previously submitted WGF comments regarding the proposed CHC for the draft Environmental Impact Statement for more information, PSC reference number 364009 in Docket 5-CE-146.

We find overall that the application for the CHC hvtl and the applicant's proposed alternative contains substantial deficiencies. As a result, in our opinion, the need for this project to meet energy demands and the direct benefit of the project to Wisconsin energy users and ratepayers has not been substantiated. Overall, we believe that a no build alternative, or a base with asset renewal alternative will provide sufficient (or better) energy reliability, while avoiding the substantial costs to ratepayers and the documented environmental, aesthetic, and property-related impacts this project will incur.

Some of the primary deficiencies in the application include:

- **The application does not satisfy requirements for approval in state law because the project does not demonstrate that "The proposed facility satisfies the reasonable needs of the public for an adequate supply of electric energy".** In fact, the application appears not to even attempt to argue that need, and instead focuses on other justifications including balancing excesses and deficits of generation capacity within the much larger MISO region. While there may be benefits to the out of state utilities that will buy and sell this power, Wisconsin ratepayers will be committed to years of additional costs for a project that does not meet a Wisconsin need.

- **The application fails to seriously consider non-transmission alternatives that are becoming increasingly utilized due to new technologies and that would improve reliability with much lower costs and environmental impact.** Distributed Energy Resources Systems (DERS) incorporate distributed renewable generation and storage, microgrids, and other technologies that can optimize load management and minimize generation and transmission needs. As a result of this emerging technology it is likely this project could be obsolete much sooner than the 40-year payback period the application contemplates.
- **The proposed project will create significant environmental impacts within a region of unusually rich ecological resources and designated conservation areas.** In particular, the project will impact: The Upper Mississippi River National Wildlife and Fish Refuge – A designated Wetland of International Importance; The Southwest Wisconsin Grassland and Stream Conservation Area; and five designated Important Bird Areas. The Driftless Area provides habitat for a substantial number of avian, mammalian, reptile, amphibian, insect, and plant species that are endangered, threatened, or of special concern. WGF requests that the PSC refer to the previously submitted WGF comments regarding the Driftless Area for the draft Environmental Impact Statement for more information, PSC reference number 364009 in Docket 5-CE-146.
- **We believe that the Driftless Area's ecological, social, and economic significance is quantifiable, and the proposed CHC should value the full range of economic impacts on affected lands and communities along the proposed routes.** There has been substantial public and private investment in the natural resources and recreational facilities of the Driftless Area and the area supports a vibrant and growing economy based around tourism, recreation, and alternative agriculture – all activities that depend on environmental quality and scenic beauty. Based on accepted conservation science related to species and ecosystem response to habitat loss and fragmentation, and the documented economic, scenic, and environmental impacts of similar projects, we believe the proposed CHC hvtl would have significant adverse impacts on these resources along the proposed routes. The project's Environmental Impact Statement does not adequately address these issues.

Given the failure of the application to demonstrate the public benefit and need required by statute we believe that either a "no build" alternative, or the "Base with Asset Renewal Alternative" (BWARA) that PSC staff have developed deserve priority consideration.

Thank you for your considering these comments.



Fred Clark, Executive Director