



SOUL OF WISCONSIN

Restoring Ratepayer Energy Priorities

December, 2014

Speaking for ourselves, communities and our futures

Is there a good chance we can stop the Badger-Coulee line? Yes there is. The final decision comes down to the opinions of three people, our Public Service Commissioners, later this spring. Each of us has an opportunity to appeal directly to these individuals during the upcoming Public Hearings in Waunakee, Holmen, Cashton, Warrens and Wisconsin Dells on December 8, 9, 10, 11, and 15.

According to recommendations of two very experienced engineers representing public interests, the high voltage transmission option will be roundly rejected if scientific evidence, established energy trends, all energy options and standard business planning practices are followed. No need exists for it today and most of the data before the Commissioners are predictions of 10 years and longer. In recent years, two of the commissioners have backed optimistic energy use projections made by utilities and permitted many new power plants and transmission lines. They did this assuming energy use would increase and make the added costs less evident. But utility planning was wrong. The opposite occurred forcing the new costs on fewer units of sold energy, which caused rates to soar. By law, Commissioners are obligated to keep energy costs low. As use and future needs continue to drop, asking the Commissioners to exercise prudence and hold off on adding more transmission line debt will be compelling if heard over and over. If you are hard pressed by high costs now, describe this. We expect the third commissioner to be interested in the new, very cost efficient "No Wire" solutions that use energy efficiency, load management and local solar to prolong the life of existing transmission lines and substations.

Commissioners impose damage to our land, families and local economies on the basis of an electrical need they feel outweighs these losses. Whether potential losses concern you or not, be sure to quote some expert testimony and support the No Wires alternatives (pages 2-4). They cost less and deliver more. Support for the alternatives shows concern for more than one's property.

Demonstrate your commitment to the betterment of your home, business and local energy economy by citing specific energy projects you have done, are doing or planning. Is community solar on your list?

Add detail to potential negative impacts from high voltage transmission, such as health concerns and the presence of young or elderly people in your home. Name and locate threatened businesses that you and visiting friends and family patronize. Give example of a new residence or business that would not have come had a transmission line dominated the landscape.

If you do not live near an area that could be directly impacted, describe economic contributions you make visiting and driving-through. Describe why you choose certain routes. Whether a resident or a visitor, be sure to name parks, businesses, water ways, habitat types, animal and plant species and specific activities that you are personally concerned about. Make everything real in the minds of the Commissioners by citing detail and experience. Avoid generalizations. If you prefer to write rather than speak your thoughts, consider delivering your written comments in person and making one verbal, respectful request.

“NO WIRE” Alternatives to Badger-Coulee – Bill Powers, Engineer and quotable Expert Witness

Powers Engineering specializes in pricing energy efficiency, load management and local solar solutions to reduce electricity use during maximum use periods which occur for a few hours on hottest days of summer. The firm’s testimony begins by analyzing the future “peak load” predictions the utilities provided for Wisconsin and summarized:

“The gross peak load trend in ATC’s footprint is either flat or declining through 2020 on an individual utility basis..” (pg 7)

Regarding peak conditions for the La Crosse/Winona area that utilities claim will have significant growth, the firm found skewed accountability and failure of utilities to fully manage loads under peak conditions in recent years.

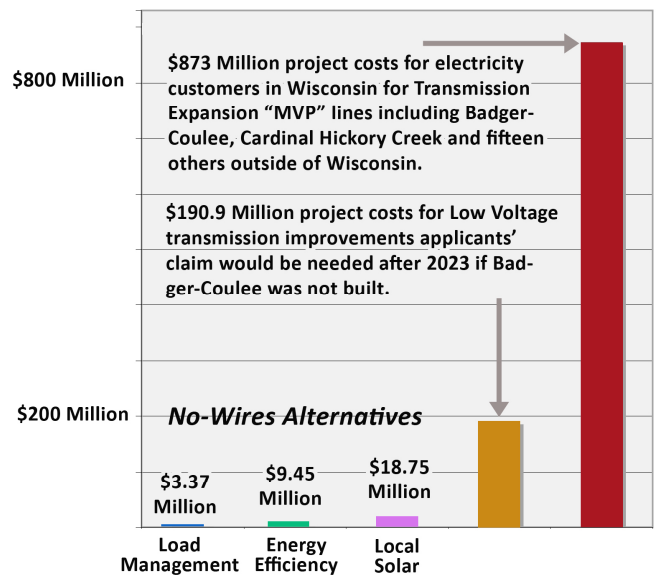
“Had the applicants compared the La Crosse/Winona area non-coincident peak load in 2006 to 2012,.. it would have determined that the rate of peak load growth was less than 0.5 percent per year, not 3.44 percent. The difference between 2006 and 2012 is only 16 MW [which] could have been addressed by available Load Management (LM) resources that were not utilized. In 2012, XCEL dispatched 0 MW of the 93 MW of LM available to it. Dairyland Power Cooperative dispatched only 17 MW of the 52 MW of LM available to it... Had these LM resources been deployed in 2012, the La Crosse/Winona area would have shown a slight decline trend in non-coincident peak load between 2006 and 2012.” (pages 6-19)

Using over-stated peak growth predictions, the applicants’ need for Badger-Coulee is based on \$190 million dollars of improvements to low voltage transmission they say will be needed starting in 2023. After refining the need for the 29 low voltage facilities and accepting the utilities’ questionable growth prediction of .22% per year, the firm calculated the costs for eliminating this growth with three No Wires solutions: Load Management (such as cycling air conditioners on off), Energy Efficiency and adding Solar installations such as to the Dairyland Power Cooperative-Vernon Electric Coop installation near Westby.



“The cost of the no-wire alternatives to offset the 0.22 percent per year peak load growth scenario, \$3.37 million for Load Management, \$9.45 million for Energy Efficiency, and \$18.75 million for solar, is a fraction of the \$190.9 million identified by ATC to upgrade Low Voltage Transmission segments as an alternative to Badger-Coulee.” (p 47)

Comparing the Costs of Three, “No-Wire” Alternative Solutions to the Cost of Low Voltage Transmission upgrades utilities use to predict an eventual reliability need for Badger-Coulee.



The above transmission “project costs” do not include considerable financing debt assumed by ratepayers for 40 years. In contrast, the “No Wire” solutions are debt-free local investments with higher returns with maximized carbon emission reductions. The above “No Wire” calculations also assume the utilities’ questionable “Slow Growth” scenario of .22% per year growth targeted for 2023. The firm cites additional economic and local investment advantages for No Wires solutions from a study recently conducted in Minnesota study:

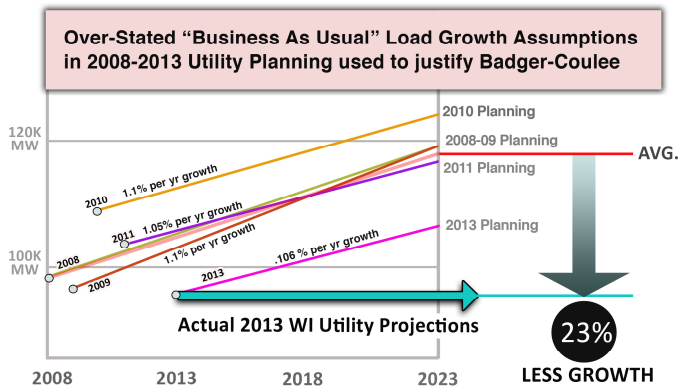
“Approximately 70 percent of Minnesota clean energy jobs are in either the energy efficiency or smart grid sectors, with a total of 10,600 jobs... Energy efficiency and solar energy sector companies...are often based locally, such as installation and maintenance of energy systems or solar panels. Local clean energy economic activity will not be generated in Wisconsin by the construction of Badger-Coulee... Imported clean energy, to the extent that it is used in Wisconsin, will displace the economic activity that would otherwise have occurred in Wisconsin to provide that clean energy.” (pages 46, 47).

Observing that solar has minimal negative environmental impacts and is easier for communities to accommodate compared to wind turbines and transmission, the firm notes:

“The applicants do not consider solar as an economic option to wind power imports despite the ability of solar power to compete effectively on economic terms. No new wind capacity was added in Minnesota in 2013. The 100 MW Geronimo solar project (in MN) represents more capacity than the 48 MW of Minnesota wind power installed in 2014.” (pages 39,40)

Badger-Coulee Ignores Trends, Lacks Benefits – Peter Lanzalotta, Transmission Engineer

Lanzalotta Associates Engineering has conducted need analysis on more than 100 proposals in 25 states. Their testimony evaluates the applicants' overly optimistic growth assumptions, concentrating on annual studies the utilities submitted promoting transmission expansion on modeling devised in 2008. They found that even recent studies consistently over-state load growth on the order of 20 percent compared to actual load forecasts provided by utilities in official state filings.



*"The benefits from Badger-Coulee decrease as the assumed rate of peak load growth decreases, but all of the scenarios the applicants studied assume some rate of positive load growth. With a **0% growth rate**, or the current projected growth rate of **.03 percent per year** between 2012 and 2020 based on utility data supplied in the 2020 Wisconsin Strategic Energy Assessment, I would expect the energy savings attributable to Badger-Coulee to be even lower, especially under economic conditions where electric rates are increasing, improvements in appliance and building codes are taking hold, and interest in distributed generation is increasing due to environmental and economic benefits. The Applicants' failure to even consider conditions of zero growth or negative growth as sensitivity scenarios means we don't really know the range of outcomes that are possible, or even likely."* (pages 3-14)

*"It is helpful to put the \$130.54 million of potential slow growth benefits from Badger-Coulee into perspective. **Over 40 years and for the approximately 3 million Wisconsin retail electric customers, this reflects an average benefit of \$1.10 per customer per year or about 9 cents per customer per month.**"* (p9)

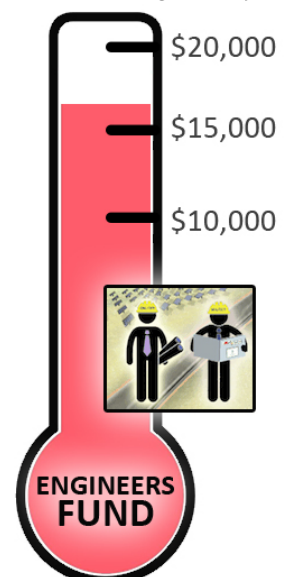
"WI electric customers pay average electric rates that are among the highest in the Midwest with increases attributed to lower use and prior

transmission investment. The higher that electricity rates go, the easier it is for alternative generation sources to compete. It is clear that the supply and demand sides of the utility business are in a state of change... Renewable and distributed generation and energy storage technologies are quickly becoming more reasonably priced and more capable as a replacement to buying electricity... When trying to predict costs and benefits of various facilities over a period of 40 years, it seems unwise to completely discount any possibility... especially true given the lack of rigor [applicants have given to] non-wire alternatives. There is little current reliability need for Badger-Coulee that cannot be addressed by reinforcements to lower voltage transmission facilities." (pages 3,12)

Asked, "Given your analysis of the costs and benefits of this proposal, the timing of this proposal and the fact that utilities have announced interests in additional, potentially connected high capacity transmission systems in Wisconsin, could this be a particularly pivotal energy decision for the state?" Mr. Lanzalotta testifies:

*I think it is reasonable to infer that the decision will be unusually influential. Given the slow and/or negative growth conditions, and the rising interest in distributed solar and accelerated energy efficiency, should the ratepayers and the PSC not be ready to move forward with full confidence, **a wise investor would probably pause at least a few years to see which trends truly develop.**"* (p24)

SOUL and the engineering firms extend our deepest gratitude for the inspiring support we are receiving. Much engineering work remains. We are working on Bay Lake and Cardinal Hickory Creek transmission line proposals as well. SOUL operates entirely on tireless volunteer labor. Special thanks to those who worked so hard to make the recent auctions in Ontario a wonderful experience and great success--especially our Amish neighbors and businesses! Please consider making a tax-exempt donation in 2014 to help us take advantage of a special \$20,000 Matching Grant. Donate on line at SOULWisconsin.org or via mail PO Box 146, La Farge, WI 54639. Fundraising: 608-625-4949



Do the Math*

After collectively investing billions into transmission expansion over the next 40 years, utilities estimate that Badger-Coulee could potentially save each electric customer in Wisconsin...

9 cents a month.

After investing \$2.50 in one, 13 watt energy efficient lightbulb, the guaranteed savings is...



60 cents a month.

**Energy use is dropping; there is no environmental gain in transmission expansion.
Inform the Public Service Commissioners of your ENERGY PRIORITIES**

Monday, December 8

3 p.m. until conclusion of comments
Waunakee Village Community Center
333 S. Madison St. WAUNAKEE, WI

Tuesday, December 9

3 pm until conclusion of comments
Holland Town Hall
W7937 County Rd MH HOLMEN, WI

Wednesday, December 10

3 p.m. until conclusion of comments
Cashton Community Hall
811 Main St. CASHTON, WI

Thursday, December 11

3 p.m. until conclusion of comments
Three Bears Lodge
701 Yogi Circle WARRENS, WI

Monday, December 15

3 p.m. until conclusion of comments
Kalahari Resorts, Suite A
1305 Kalahari Drive WISCONSIN DELLS

Comments can
also be made on line:

<http://bit.ly/TransmissionHearing>

Assumed cost of 17 regional "MVP" high capacity transmission expansion lines including Badger-Coulee 345 kV and Cardinal Hickory Creek 345 kV under "Slow Growth" economic conditions. Stated potential Badger-Coulee benefits are \$130.54 million over 40 years distributed over 3 million WI customers. A 13 watt compact florescent lightbulb with five year lifespan exchanged for a standard 60 watt bulb at cost of 75 cents used 3 hours per day saving 51 kWh per year at .134 per kWh for a savings of \$7.26 per year. Utilities state potential return on transmission expansion investment as 1.6 to 2.9:1. An assured return on investment of 2.6:1 to 5:1 is typical for Energy Efficiency.

Badger- Coulee Public Hearings

SOUL of Wisconsin

info@SoulWisconsin.org

Car-Pooling 608-625-2339

Why is it important to speak at the Badger-Coulee Public Hearings?



In addition to protecting your rights, your property and communities you depend on, these Hearings are a rare opportunity to tell the three individuals who will make the final decision about your concerns and your household energy priorities. That you pay for all energy investments gives every electric customer the right to an opinion. We cannot expect to be heard if we ignore these invitations to speak-up.

Hearings are conducted on a first-come, first-speak basis and continue until everyone gets a chance to speak. When you arrive, sign-up to speak even if you plan to submit your comments in-writing. A good way to prepare for either is to write out your thoughts. SOUL is teaming with other organizations to provide a quiet area for this with refreshments etc. If you decide to not speak, consider personally handing your written comments to the Commissioners when your name is called. You can graciously thank them for coming and add a simple sentence if you are so moved. Many end-up speaking who thought they would not.

Here are some factors that can help make your comments more persuasive:

- Expect to be respected and demonstrate this by showing the Commissioners respect even if it takes some work! Use frustration creatively. Commissioners feel most obligated to look out for the interests of “regular electric customers.” If you talk about how you want your utility bills dollars invested as a “regular electric customer” and add other concerns, its more persuasive than speaking only as a landowner. (Note: Even if we don’t use electricity, we are affected by energy use and have societal investment preferences.)
- In the past, the Commission has asked that comments stay under 3-4 minutes. Provide your name, where you live and how many people you are representing. State how long you and your family have lived in the community and positions you have held serving your community. State any energy related interests or skills you have. State when you started reading about the Badger-Coulee proposal. **The only evidence the commissioners are not required to discount are quotes from expert witnesses in the formal proceeding—like those on pages 2-4 of the newsletter or testimony quotes from other formal intervening parties.**
- DESCRIBE SOME OF YOUR FUTURE ENERGY PLANS FOR YOUR HOUSEHOLD. Name appliances and services you will need to buy with rebates: insulation, windows, refrigeration, pumps, fans, propane on-demand hot water instead of electric hot water—any thing to help you conserve and save money. Is your electric bill too high already? Could you use more help learning to conserve and becoming more efficient? Do you hope to have on-site solar or participate in community solar? Describe how past energy projects have been productive but this decision is about future investments you want to make.
- USE DETAIL TO MAKE YOUR CONCERNS REAL. Examples: If you patronize a business that would be affected by high voltage transmission, name the business and describe how you and customers would be discouraged. If you personally know of valuable natural assets, tourism, activities or business interests that would be compromised, name locations, habitats, species and activities. Health concerns are regarded more seriously for very young or older. Describe high voltage transmission as a **potential** intrusion. Don’t let the phrase “**will**” slip out as this undercuts the reality that the NO WIRES alternatives are fully possible.

Public Service Commission of Wisconsin (PSC)
Public Hearing Comments Regarding the Badger-Coulee Proposal
Mail to be received by January 5, 2015 or comment on line: <http://bit.ly/TransmissionHearing>

Public Service Commission of Wisconsin
Public Hearing Comment 05-CE-142
P.O. Box 7854 Madison -Wisconsin 53707-7854

A comment may consist of the writer's personal knowledge or personal opinions only. A reference document, newspaper article, professional journal article, white paper, study or any other prepared material not written by the person commenting is not considered a public comment, but may be referenced in a person's comment.

Utility Case 5-CE-142: 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.

Name: _____

Street Address: _____ Email (optional) _____

City, State, Zip: _____

Comments:

This comment is submitted in lieu of testimony pursuant to a Notice of Hearing issued by the Commission in this docket. I have not previously submitted written public comments in this docket in response to this Notice of Public Hearing.

Signature _____ Date _____

