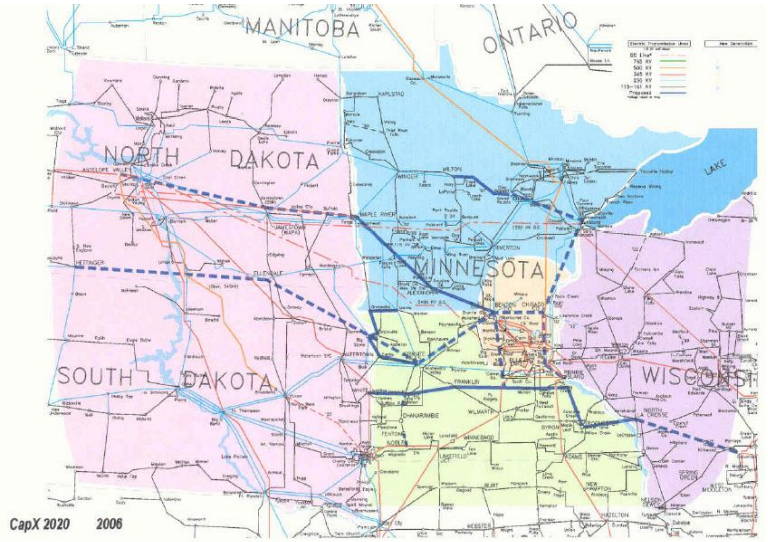
What's the impact of EPA regulation of CO2 where we have a web of transmission, RES without any linkage to coal, and a federal court decision supporting North Dakota coal?

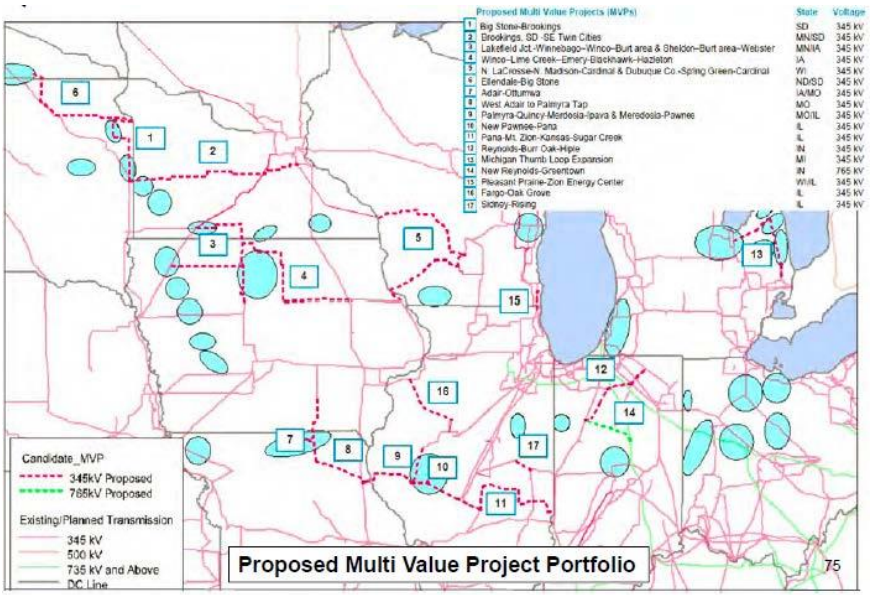
It's too late – we've enabled continued coal and new coal generation locked in with 50 year infrastructure to support it!

The "Coal on the Wires" transmission lines through Minnesota are mostly permitted and built or under construction. Here's CapX 2020, starting at the coal plants in North Dakota:



Add this:

And MISO's 17 Multi-Value Project list now beginning permitting in MN and WI:



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Billions of dollars of transmission build-out here in the Midwest – well on the way to JSCP:

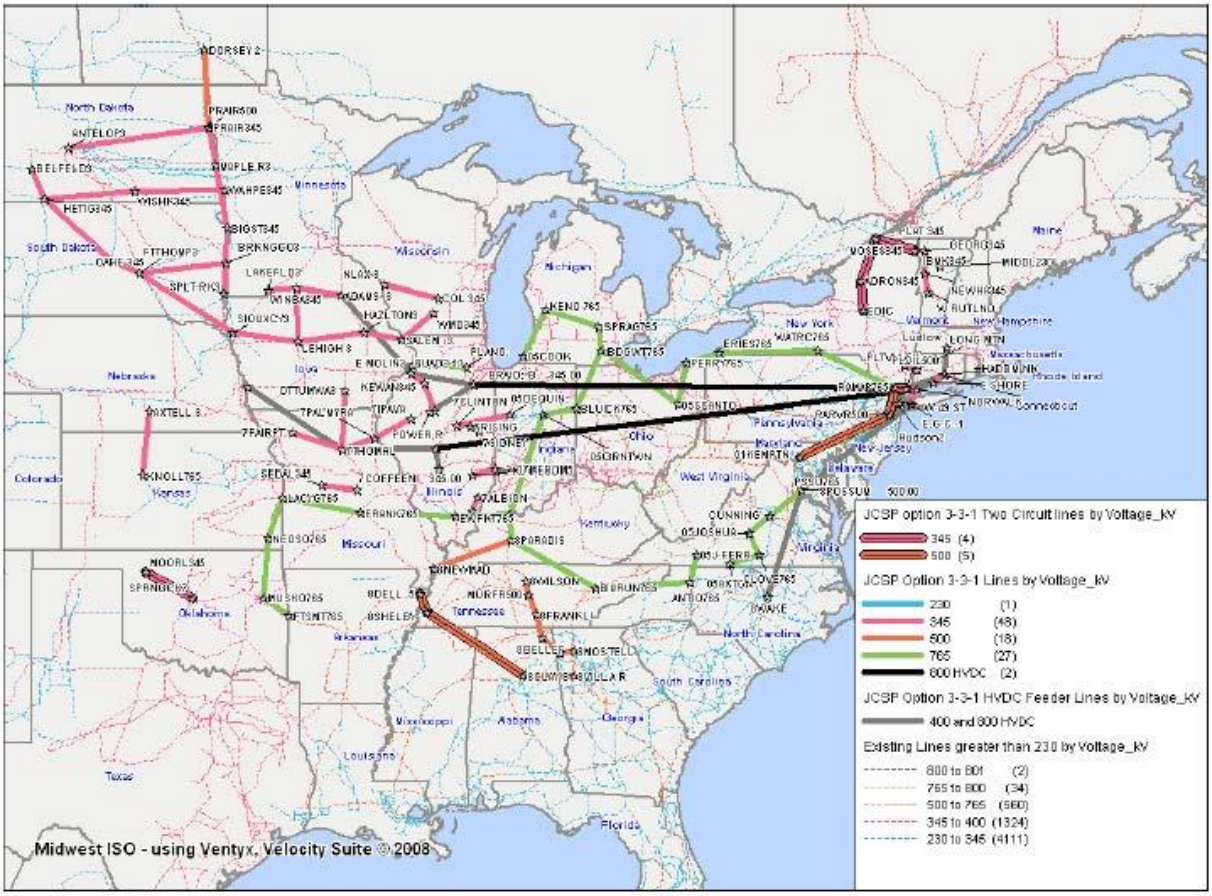


Figure 1-2: Reference Scenario Conceptual Transmission Overlay

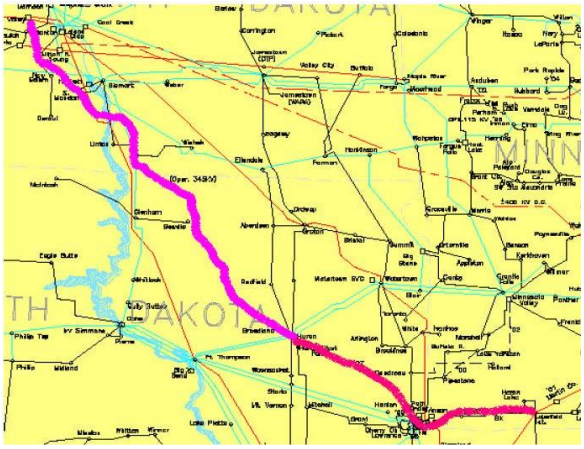
When CapX 2020 was at the PUC for the Certificate of Need, MISO's Jeff Webb testified that there was 3,441 of new coal in ND, SD, IA and MN in the MISO queue (and over 7,000 MW of wind in the Illinois queue). Evidence regarding regional transmission of coal was not allowed. All CapX 2020 projects were approved. And we know transmission for coal has "benefits."

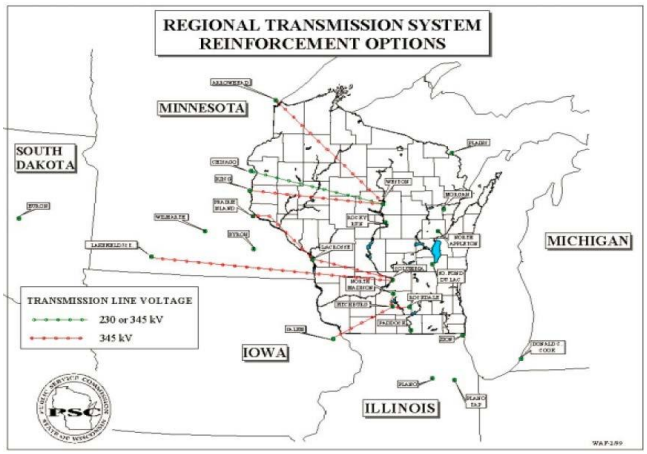
> **ICF-Independent Assessment MISO Benefits** at http://nocapx2020.info/wp-content/uploads/2014/06/ICF-IndependentAssessmentMISOBenefits.pdf
>
> *RTO operational benefits are largely associated with the improved ability to displace gas generation with coal generation, more efficient use of coal generation, and better use of import potential. These benefits will likely grow over time…*

"Coal on the Wires." Billions of dollars of infrastructure to facilitate transmission of coal.

Not one RES in the nation requires any link of renewable generation with shutdown of coal. There's no talk of closing the coal plants in the area where CapX 2020 transmission starts. And after all, additional transmission for coal has been in the works for a long, long time, well over the documented 15 years that I know of:

<u>Lignite Vision 21 Transmission Study</u> & WRAO/WIREs Studies – circa 1999
http://nocapx2020.info/wp-content/uploads/2014/02/lignitevision21transmissionstudy.pdf
http://nocapx2020.info/wp-content/uploads/2012/02/wiresphaseii20120214-515026913742.pdf





You can see how the "new" CapX 2020, JCSP, and MISO MVP plans have built on the foundation of Lignite Vision 21 and WRAO/WIREs, and we can see where this is going.

As I noted on **<u>No CapX2020</u>** not long ago, here's what's up with coal right now, particularly the recent **<u>federal court decision on the Next Generation Energy Act</u>**,:

- Not one North Dakota coal plant has been shut down. Instead they send it to market!
- Minnesota Power bought a "coal line" coming from ND into Minnesota, and once CapX 2020 is up and running at the western end, that coal generation will be on CapX.
- Read the **<u>federal judge's decision on the Next Generation Energy Act</u>**, declaring it unconstitutional. First, the decision notes that the Dry Fork coal plant has been moved from the West into the Eastern Interconnect (it's "new coal" now on transmission heading our way that wasn't coming here before).
- Also in that decision, **<u>it discusses plans for a new coal fired plant in South Dakota</u>**.
- And also the **<u>potential for an additional unit at Dry Fork</u>**, which is now in Eastern Interconnect (coming our way).
- AND it discusses **<u>the surplus at Milton Young</u>**, which would be exacerbated by transmission prohibitions of the Next Generation Energy Act.

Not one Renewable Energy Standard/Mandate requires that coal be shut down, only the addition of "renewable" generation. Think about that. If we shut down the coal, for instance the North Dakota coal where CapX starts, there's plenty of transmission capacity for wind and the back-up gas or hydro to firm it up. Are we serious about lowering CO2 generation, are we serious about shutting down coal? Apparently not. Look at the transmission lines we've permitted for coal.

When you hear promotion of transmission, remember, transmission doesn't reduce emissions, doesn't reduce CO2 or anything else. Transmission passively serves whatever generation is there, in the Midwest maybe some wind generation on top of an admitted surplus of firm coal reservations, and would facilitate new coal that the Dakotas want to build. Promoters of transmission have a financial interest. Consider the source – follow the money.