

**BEFORE THE
PUBLIC SERVICE COMMISSION OF WISCONSIN**

Joint Application of American Transmission Company, ITC
Midwest LLC, and Dairyland Power Cooperative for
Authority to Construct and Operate a New 345 kV
Transmission Line from the Existing Hickory Creek
Substation in Dubuque County, Iowa, to the Existing
Cardinal Substation in Dane County, Wisconsin, to be
Known as the Cardinal-Hickory Creek Project

05-CE-146

**JEWELL JINKINS INTERVENORS
REQUEST TO INTERVENE AND NOTICE OF APPEARANCE**

Pursuant to Wis. Stat. §227.44(2m) and Wis. Admin. Code § PSC 2.21, Alan and Marcia Jewell, Patricia and Richard Jinkins, and Wade Wendhausen, the “Jewell Jinkins Intervenors,” hereby file this request to intervene in the above-captioned proceeding. The Jewell’s attorney, in this Motion, includes a Notice of Appearance. Jewell Jinkins Intervenors request that they be granted party status if no objection has been filed within 5 days of receipt of this Request.

Wisconsin law provides that a person whose substantial interests may be affected by the commission's action or inaction in a proceeding shall be admitted as an intervenor, and may intervene in a proceeding or docket if the person's participation likely will promote the proper disposition of the issues to be determined in the proceeding or docket, if the person’s interests are distinct from those of other intervenors and that their interests are not represented by other intervenors, and if the person's participation will not impede the timely completion of the

proceeding or docket.

Alan and Marcia Jewell, of the Jewell Jinkins Intervenors, are landowners directly affected by two of the proposed routes for the Cardinal-Hickory Creek line, and have a significant interest in the outcome of the proceeding, with greater stakes in that outcome than other intervenors. See Wis. Admin. Code. § PSC 2.21(1). Jewell Jinkins Intervenors also meet the requirements for permissive intervention, as directly and indirectly affected landowners with direct and indirect interests, particularly based on their substantial interest in the related multiple Badger Hollow dockets and intervention in those dockets, and should be granted permissive intervention. See Wis. Admin. Code § PSC 2.21(2). No other intervenor can, or could, represent the Jewell Jinkins Intervenors' interests in this proceeding.

The Jewell Jinkins Intervenors satisfy the criteria for intervention, and hereby makes this Request to the Wisconsin Public Service Commission to intervene in the above-captioned docket as a party with all the rights, responsibilities and obligations of full party status. In support of its Motion, Jewell Jinkins Intervenors make the following statements:

I. STATEMENT OF INTEREST

Jewells are residents and landowners with parcels in Iowa County with a portion their homestead and farmland on two routes proposed for the 345kV transmission line known as Cardinal-Hickory Creek. After review of the application and inquiries with PSC staff, they have many general and specific concerns. As landowners, they have longstanding interests in their land and in the community, and are concerned about impacts of the project on this land, known as the most productive, best agricultural land in Wisconsin. They would be affected by the project's proximity to and physical intrusion into their property and into their established community. They are concerned about impacts of electro-magnetic fields on livestock and operations; of

viewshed impacts, drainage, and construction concerns such as noise, dust, loss of production on land used for project, construction and access, and other concerns specifically related to Jewells as directly affected landowners. Jinkins and Wendhausen, of the Jewell Jinkins Intervenors, live in close proximity to the proposed transmission line routes and share the Jewells' concerns.

Jewell Jinkins Intervenors are also concerned about broader issues, such as impact on energy rates and are concerned about the apportioned increases to all Wisconsin ratepayers, which will fund this specific project and the MVP 17 project portfolio, including costs associated with building, financing, operating, maintaining and providing security for the proposed high capacity high voltage transmission line over a period of 25-50 years or more. They are concerned about the long-term implications of the concentration of power generation and industrial facilities that are enabled by high capacity high voltage transmission lines, inciting projects such as the Badger Hollow solar farm, generation literally covering thousands of acres of ag land and essentially surrounding our home. Jewell Jinkins Intervenors are also concerned about the cost impacts associated with all the implied options and alternatives in this case.

“Need” for this 345 kV high capacity high voltage line is at issue. Need for this project must be demonstrated to obtain a CPCN from the Commission. This project was postponed for roughly two years, and it's not clear that it is needed now.

Jewell Jinkins Intervenors are concerned about the interwoven transmission, solar, and wind projects in the project area, proposed and planned. Transmission interconnection requirement arrangements for the Badger Hollow solar project through MISO/ATC, as cited in the Badger Hollow application, and “Eden Outlet” remarks in the Cardinal Hickory Creek transmission application suggest that utility interests are promoting development of a very significant amount of generation in the area, claimed at 600MW, not “just” the proposed 300

MW Badger Hollow project, but including one or more wind projects as well. This would amplify cumulative environmental impacts and the economic cost impacts that local economies in many communities near such plants face in preserving the health and appearances of natural assets. Agriculture is the major economic driver in this area, agriculture and associated direct and indirect business are a major employer, thus protection of prime ag land is a significant concern. Tourism is a growing revenue stream, and the continued attraction of new businesses which take advantage of the significant aspects that these quality of life and values are crucial considerations. Large industrial solar projects require not only large commitments of land, prime agricultural land, but which also require infrastructure commitments, including the collector system and transmission. By focusing on large projects such as this, that removes incentive for solar installations near load, distributed generation where electricity is needed. The focus of utility infrastructure development should be on residential, farm, big box commercial, local and state government roofs, where there is good access to the sun and no need for transmission infrastructure and/or network upgrades.

As Jewell Jinkins Intervenors have learned more about the project, their concerns have grown, and while the above paragraphs detail some of their concerns, meant to demonstrate Jewells' unique interests as landowners affected by two of the proposed routes, and the Jewell Jinkins Intervenors broader concerns, these concerns are not all inclusive, and they expect that other issues will become apparent.

Jewell Jinkins Intervenors' interests are distinct from those of other intervenors, including those state interests of other landowners, the impacts are substantial, and their interests are not represented by any other party. Jewell Jinkins Intervenors' participation as intervenors will promote the proper disposition of the issues to be determined in the proceeding or docket. We

