

January 2, 2019

To: Intervenor, Docket 05-CE-146
From: S.O.U.L. of Wisconsin, Inc.
Re: SOUL Intervention focus and limits on representation.

The below clarifications may inform your preparations for the January 3, 2019 Prehearing Conference in regard to Administrative Law Judge Michael Newmark announced possible consideration of some intervenors' interests being represented by our not-for-profit organization.

1. The S.O.U.L. of Wisconsin Board voted on October 30, 2018 to intervene in docket 05-CE-146 to provide additional expertise in the case concerning applications of Non-Transmission Alternatives. The board also determined that SOUL would not request intervention compensation funds from the Public Service Commission of Wisconsin for the docket.
2. SOUL's Request to Intervene and Notice of Appearance, filed on November 19, 2018 is accessible here: <http://apps.psc.wi.gov/pages/viewdoc.htm?docid=353482>
3. Please be advised, intervenor requestors, that SOUL is unable to represent land-based concerns raised by the private and municipal intervenors. It is our experience and our practice that Wisconsin's requirement of multiple transmission route options renders it impossible for our organization to represent one landowner's interests without creating conflicts of interest with other landowners.
4. The presence of four, complex alternatives in this docket makes it extremely difficult for the diverse interests developed by potentially impacted parties to be adequately categorized by route(s). SOUL respectfully observes that fair representation is most assured when each announced party is granted their own, unique representation as a full party intervenor.
5. It has been traditional for SOUL members to intervene on their own accord in order to represent interests beyond those the organization will address. To the best of our knowledge, the Administrative Law Judge has recognized these distinct interests-- including one intervenor in the Badger-Coulee case. From our records, there appear to be nine members of SOUL among the forty-nine other requesting intervenors in Judge Newmark's designated "Group Five" in this docket.

Sincerely,
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