

**BEFORE THE
PUBLIC SERVICE COMMISSION OF WISCONSIN**

Request for Comments on Draft Order Adopting
Application Filing Requirements for Transmission
Line Projects

Docket No. 5-AFR-100

**COMMENT ON APPLICATION FILING REQUIREMENTS DRAFT
AND DRAFT COMMISSION ORDER**

CAROL A. OVERLAND - LEGALELECTRIC

Thank you for opening this Application Filing Requirements docket for Transmission Projects.

Since the Arrowhead Transmission Project, I've represented many clients and groups on transmission issues in Wisconsin. What concerns me the most is that crucial aspects of transmission CPCN permitting and routing in Wisconsin are not addressed, in short, some observations:

- Wisconsin allows routing far too close to residences and buildings, in some cases, nearly over homes, just a few feet from someone's front steps, etc. This is not responsible routing and is not in the public interest.
- Many of these projects are for private gain, transmission projects proposed to enable large central station power that rather than being sited near load, is sited far from load and enabling further transmission build-out, a most profitable venture for a utility, and enabling utility control of our electric generation system.
- The Commission does not address the inherent inefficiency of transmission, with line loss sucking too much of the energy generated, and in renewables, with lower generation capacity than fossil, the percentages of generated energy is unacceptably high, another reason renewable generation must be sited near load.
- The Commission should not enable these practices by granting PRIVATE companies the power of eminent domain.

- The Commission has been unreasonably stingy with Intervenor Compensation, refusing to grant adequate Intervenor Compensation to Intervenors working hard, at their own expense, to weigh in on projects affecting their community. Instead, the Commission lavishly gives out IC to organizations promoting the projects, organizations with significant annual funding from the Commission and significant funding from other sources. It's time to level the playing field (though of course, not to the excess seen in the Arrowhead project!!).

Thank you for the opportunity to comment on these important issues.

PLEASE ADD MY NAME AND CONTACT INFORMATION TO THE MAILING LIST FOR THIS DOCKET AND

Dated: September 15, 2022



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