Plymouth Utilities 900 CTH PP - P.O. Box 277 Plymouth, WI 53073-0277



Telephone: 920-893-1471
Facsimile: 920-892-2760
www.PlymouthUtilities.com
plymouthutilities@plymouthutilities.com

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Informational Update: Plymouth Utilities Substation No.5 and ATC Transmission Lines:

Below is an informational update on Plymouth Utilities Substation No.5 and the ATC transmission lines to serve the substation, including information responsive to questions we've received recently. If you have additional questions or if you'd just like additional information, please contact us at 920-893-1471 and we'd be happy to talk or have someone get back to you.

Plymouth Utilities encourages those with questions or concerns regarding transmission line routes, potential construction or operational impacts, or other related matters to contact ATC at (866) 899-3204.

Thank you.

Tim Blakeslee
City Administrator/Utilities Manager

Update 2/26/25 - Q&A follows on Page 2 through 4:

Following a year-long review, the Public Service Commission (PSC) issued an order in January approving an ATC project to build transmission lines to connect a new Plymouth Utilities substation to the ATC grid. Since then, a local group has asked for additional study of possible environmental impacts as part of its request for judicial review of the ATC transmission line order, as further discussed below. The PSC decision on the ATC transmission line case and related details can be found online in PSC docket 137-CE-205.

Meanwhile, Plymouth Utilities continues construction on the substation approved by the PSC in early 2024, designed to improve reliability of electric service in the southwest quadrant of the utility's service area and to accommodate service to increased load in the area. Plymouth Utilities also continues to work on new distribution lines to deliver power from the new substation to customers in the area.

The new substation, proposed after a thorough vetting of alternatives, has gone through multiple reviews and approvals, including:

- City of Plymouth (December 2022);
- Town of Mitchell (December 2023); and,
- Public Service Commission of Wisconsin (March 2024, Docket 4740-CE-106, affirmed by the Sheboygan County Circuit Court in November 2024, Case Number 2024CV000186).

Under the independent oversight of the Public Service Commission (PSC), Plymouth Utilities has a responsibility to build and operate facilities necessary to serve its customers, including this substation. More details and the final decision can be found on PSC docket: 4740-CE-106.

Questions and Answers:

What is Plymouth Utilities position on the transmission lines? Plymouth Utilities appreciates the review of the PSC on proposed transmission lines and looks forward to being able to energize its substation to better serve its customers. Plymouth encourages those with questions or concerns regarding transmission line routes, potential impacts, or other matters to contact ATC. Plymouth also affirms the right of those affected by a PSC order to seek independent review through the courts. (Updated 2/26/25)

A recent news article said that the PSC is considering reopening the transmission line case Thursday (February 27, 2025) based on a public comment submitted by a local public official. Is this true? No, the PSC has clarified that their meeting agenda included an erroneous link which likely resulted in misunderstanding, including the perspective in a recent news story.

The updated PSC agenda (PSC Ref #<u>534816</u>) includes the following note:

<u>Note on Correction:</u> There is no substantive change to the Agenda. Agenda Item 9 – as originally noticed – is to consider "ATC Petition for Reopening and Rehearing". This correction removes an erroneous link that previously appeared under Item 9. Due to a document conversion error, a link to a comment that the Commission received on its Electronic Records Filing System in relation to this docket was erroneously inserted and is not relevant to the Commission's consideration of this Agenda Item as originally noticed. **(Updated 2/26/25)**

I have heard questions regarding the need for an Environmental Impact Statement prepared as part of the ATC transmission line docket, can you provide more info? As an electric transmission customer of ATC, Plymouth Utilities was not involved in the routing or in the environmental reviews of transmission lines. However, the PSC docket record includes pertinent information. A proposed transmission line must include a review of environmental impacts, and a 72 page report of the review the PSC, conducted in partnership with the Department of Natural Resources (DNR), is available, detailing the scope, issues identified, public input received, and staff recommendations. (See "Plymouth Reliability Project Environmental Assessment," 72 PSC Ref#: 504262) One of the outcomes of that review is a determination about whether the additional step of conducting a formal Environmental Impact Statement (EIS) is necessary under the statutory requirements of Wis. Stat. §1.11. As summarized on pages 2-3 of the PSC final decision in the ATC docket, based on the review that had been completed, the PSC found that a formal EIS was not required. (Updated 2/26/25)

I have heard questions regarding possible adverse effects on Nichols Creek. Were these concerns addressed in the PSC review? Plymouth encourages those with questions or concerns regarding transmission line routes, potential impacts, or other matters to contact ATC. However, based on a review of the record, after these concerns were raised, they were addressed by ATC (see for instance ATC Rebuttal Biemann, PSC Ref #515058, pp. 14-15), and considered by the PSC (see for instance PSC Final Decision in 137-CE-205, PSC Ref #531454, "Routing", pp. 21-24.) (Updated 2/26/25)

What prompted the construction of a new substation? The electric distribution equipment in the southwestern portion of the Plymouth service territory has reached near capacity in recent years. In addition, ANR Pipeline Company (ANR), a current customer of Plymouth Utilities, notified the utility that they are planning to improve their Kewaskum Compressor Station, increasing capacity and shifting primary means of compression from gas-fired to electric, as part of its own reliability and improvement program. To improve the electric reliability of service for all customers and to support the increased load at the compressor station, a new substation is needed. (Updated 2/19/25)

What is Plymouth Utilities' role and what is ATC's role? Plymouth Utilities is responsible for the construction and maintenance of the new substation in the Town of Mitchell. As a municipally-owned utility providing electric service to the City of Plymouth and parts of 10 surrounding townships, Plymouth Utilities also is responsible for the construction and maintenance of electric distribution lines to local homes and businesses it serves.

As owner and operator of the high voltage electric transmission grid throughout much of Wisconsin and as Plymouth Utilities' electric transmission service provider, ATC is responsible for planning, getting approval and building of high voltage electric transmission facilities, including those necessary to serve the new Plymouth substation. (Updated 2/19/25)

Why is Plymouth Utilities planning to serve the ANR compressor facility?

- The ANR compressor facility is in the Plymouth Utilities service territory and is an
 existing Plymouth Utilities customer. Service territory is regulated by the Public Service
 Commission.
- The best value planning process for the new substation and distribution circuit reconfiguration sought reliability and capacity benefits for all of the customers served in the southwest portion of the Plymouth Utilities service territory, in addition to being able to serve ANR's needs.
- The Southwest service area is currently served by a 17-mile radial distribution line. Any
 significant fault will cause an outage for much of, if not all, the area. By sectionalizing
 the new proposed circuits and constructing the new substation, it is expected that no
 more than 500 customers would be affected by a distribution circuit outage, as
 compared to thousands before.
- The increase in load generated by the ANR project will help support the operation and maintenance of the Plymouth Utilities distribution system and help to maintain quality service and rates for all Plymouth Utilities customers.
- ANR is paying for 100% of the upgrades in the local distribution line that goes from the new substation to the compressor facility and 8/11 of the new substation cost totaling ~\$6.75 million. These are costs that Plymouth Utility customers would otherwise incur. (Updated 2/19/25)

Did Plymouth Utilities consider alternatives prior to deciding on building a new substation? Plymouth Utilities reviewed options over 12-18 months and proposed a solution for the needed substation based on a combination of factors, including benefits to customers, minimizing costs, best timing, and managing overall impacts. The Public Service Commission (PSC), the agency charged with independently reviewing and ensuring the prudence of utility projects, unanimously approved the substation proposal, issuing a Final Decision in March 2024, including the following

Findings of Fact:

- Alternatives to the proposed project have been considered, but no other reasonable alternatives to the project exist that could provide adequate service in a more reliable, timely, cost-effective, and environmentally responsible manner.
- Energy conservation, renewable resources, or other energy priorities listed in Wis. Stat. §§ 1.12 and 196.025, or their combination, would not be cost-effective, technically feasible, or environmentally sound alternatives to the proposed project.
- The general public interest and public convenience and necessity require completion of the proposed project. (Updated 2/19/25)

I have heard that a landowner along the route was left off mailing lists and was made aware of the project by neighbors. Mailing lists that ATC used to notify landowners as well as lists the PSC used for each public notice regarding the transmission line docket are available online. For instance, on Feb. 16, 2024, the PSC sent a letter "to notify property owners near the proposed project" about the application received, proposed routes for transmission lines, the review that the PSC was initiating, and opportunities for public input (PSC Ref 491492). The "WEPA Mailing List" used for that document is available as PSC Ref. 491490. (Updated 2/26/25)