

**KICKAPOO VALLEY RESERVE INFORMATION REQUEST
REGARDING POTENTIAL 765 kV TRANSMISSION LINE DEVELOPMENT**

WHEREAS, the Midcontinent Independent System Operator (MISO) and Dairyland Power Cooperative have announced intentions for a 765 kV transmission line known as, "*LRTP Project #26, North Rochester - Columbia*;" that is designated to pass, in part, through Vernon, Crawford, Richland, Sauk and Columbia Counties;

WHEREAS, Dairyland Power Cooperative has announced that, "Dairyland Power Cooperative and GridLiance Heartland, LLC (GridLiance), a subsidiary of NextEra Energy Transmission, LLC, have reached an agreement to jointly develop and co-own the *MariBell* Transmission Project. . . the middle segment of the North Rochester-Columbia 765 kV line;"

WHEREAS, in July 2025, Dairyland Power Cooperative additionally explained, "A route for the *MariBell* transmission line has not been determined. Dairyland and GridLiance Heartland are studying potential routes to determine a preferred route. . . The route options will be shaped by input from landowners and other stakeholders and *will focus on using existing transmission corridors as much as possible*. . . We are studying potential routes, *with input* from landowners, environmental organizations, *state* and *federal agencies*, local governments, and other stakeholders and interested parties;"

WHEREAS, a much lower voltage, recently rebuilt, single circuit, 69 kV, wooden pole transmission line that is approximately 70' high now crosses the Kickapoo Valley Reserve through Star Valley spanning a distance of approximately 7,980';

WHEREAS, instead, the proposal would add a 765 kV transmission with 199' towers cutting a glaring, 200' wide scar across Star Valley impacting these and other features: 1,300 lineal feet of woodland; 1,300 feet of prairie restoration; passage 380' from the *Valley of the Ice*; passage over the Snowshoe trail; passage over the Kickapoo River where the towers would be prominent for canoeists more than 2,000 feet upstream and 1,200' feet downstream; passage for 1,000' along highly sensitive vernal ponds; passage 200' adjacent to 4 acre spring fed pond; passage 1,300' from the *Star Valley Settler's Memorial*, passage 700' from Campground B; passage 400' from Campground D; passage 3,000' from the KVR Visitors Centers, and passage directly over State Highway 131, a tourism thoroughfare in Vernon County;

WHEREAS, infrastructure of this scale in combination with construction disturbance would directly conflict with these policies and goals of the Kickapoo Reserve Management Board and the Ho-Chunk Nation:

- To promote, preserve and enhance the Reserve's unique natural, scenic, and cultural features creating a Driftless Area Ecoregion as a destination for low-impact tourism and education; To protect, conserve, and maintain a very significant number cultural sites that are part of the Upper Kickapoo Valley Prehistoric Archaeological District, listed on the National Register of Historic Places;
- To deploy and develop natural resource and agriculture management practices to improve water quality, maintain soil productivity, and protect wildlife habitats;
- To monitor and notify the Ho-Chunk Nation and the State Historical Society of any activity on their lands that may have an adverse effect on a significant site(s) including ground disturbance, physical

destruction, damage, alteration, or isolation of a site's historic significance; and the introduction of visual, audible, and atmospheric elements that are out of character with the natural setting signaling neglect, deterioration or destruction;

- To plan and perform investigations including surveys with notification of The State Historical Society Officer for opportunity for comment and direction;
- To prevent all forms of light pollution to protect the dark skies in and around a combined 13,300 acres along the Kickapoo River in collaboration with Wildcat Mountain State Park and the Mississippi Valley Conservancy;
- To assume responsibilities for protecting and sustaining habitat for the *Important Bird Area* under the Wisconsin Bird Conservation Initiative in collaboration with Wildcat Mountain State Park;
- To assume responsibilities for protecting the designated *State Natural Areas* within the Reserve recognized for their highly diverse plant communities with numerous rare plants and animals and significant archeological and geological features;
- To protect the Federally Endangered and State Special Concern Rusty Patched Bumble Bee which has been documented around the Visitor Center and the DOT has developed a mowing schedule in the KVR to protect them as well as other pollinators.

WHEREAS, Dairyland Power Cooperative (DPC) is a member of MISO and stakeholder-participant in MISO LRTP Tranche 2.1 planning;

WHEREAS, a transmission line of this size and characteristics has never been considered or constructed in Wisconsin, to date;

WHEREAS, the cost of the *MariBell* segment that would be assumed by electric customers has been estimated at \$238.7 million plus 4-5 times this amount in new power plant costs;

WHEREAS, the officially assigned *Independent Monitor* of the MISO wholesale electricity market and MISO's transmission planning, *Potomac Economics*, has found that MISO's Tranche 2.1 planning:

- Assumes a view of the future that is "extremely unlikely;"
- Projects "overstated" or "invalid" benefits for customers in five of eight key categories;
- Would undermine customer-side investments in "resources, [battery] storage and other alternatives to transmission";
- Transmission projects including 765 kV lines should be "postponed" until previously planned 345 kV transmission projects are built and their impacts on the electricity market are known.

WHEREAS, the Public Utility Commissions of North Dakota, Montana, Arkansas, Mississippi and Louisiana have filed a complaint with the Federal Energy Regulatory Commission largely founded on *Potomac Economics* findings that, "Without the makeweight benefits and erroneous calculations and assumptions presented in the LRTP Tranche 2.1 business case, the substantial costs imposed on customers would be unjustified. . . There is no public forum where these costs are discussed and addressed by a regulatory body. . . This Complaint is the only way the Concerned Commissions can ensure a regulatory review on behalf of ratepayers." (FERC case EL25-109);

WHEREAS, a 765 kV transmission facility would add hazardous obstacles for numerous migrating and resident raptors, waterfowl, grassland birds, and songbirds that frequent the Reserve;

WHEREAS, 765 kV transmission facilities create audible noise and visible corona discharge effects that are significantly magnified under high humidity and damp conditions;

WHEREAS, the topology of the Reserve features numerous springs, streams, wet habitats, and valleys where high humidity conditions including dense fog are frequent;

WHEREAS, a 765 kV transmission line could have adverse property value impacts on neighboring private properties based on a PSC impact statement finding that 345 kV transmission lines "may result in negative affects to property values, tax credits and heritage tourism;"

WHEREAS, neighboring occupied homes and outbuildings are located as close as 40 to 100 feet from the center line of the existing transmission line facility;

WHEREAS, MISO Tranche 2.1 planning assumes that electrical energy use will substantially increase and that §1.12(2) Wisconsin Energy Policy stipulates that a state agency or local governmental unit *shall investigate and consider the maximum of energy resources as an important factor when making any major decision that would significantly affect energy usage*;

WHEREAS, Wisconsin does not yet have legal statute regulating the use of 765 kV transmission lines and proposals for said regulation are expected to come before state lawmakers;

WHEREAS, now is the most opportune time for state agencies and municipal governments to gain knowledge about 765 kV transmission in order to make recommendations to state lawmakers towards the realization of suitable regulation;

THEREFORE, BE IT RESOLVED, that

The Kickapoo Reserve Management Board requests Dairyland Power Cooperative and GridLiance-Heartland to provide the following information either in written, electronic format, or through an in-person presentation before our Board before March 31, 2026:

1. A map of eligible, existing transmission line routes for the considered 765 kV transmission line project through Vernon, Crawford and Richland Counties.
2. Images of tower designs considered for use with the 765 kV transmission line Project sited alone and in combination with a 69 kV transmission line.
3. Documentation portraying the minimum and maximum height, in feet, that the 765 kV towers could be if the 765 kV line was the only transmission facility located in the corridor.
4. Documentation portraying the minimum and maximum height, in feet, that 765 kV towers could be if co-located in the same corridor with a 69 kV single circuit transmission line. Specify whether the facilities would be mounted on the same towers or on separate towers.
5. Documentation portraying the minimum and maximum width, in feet, that corridors for 765 kV towers could be if the only transmission facility including guy wires and all other potential protuberances.

6. Documentation portraying the minimum and maximum width, in feet, that corridors would be for 765 kV towers co-located, in the same corridor, with a 69 kV transmission line. Specify whether both transmission facilities would be mounted on the same tower or on separate towers.
7. Documentation portraying the maximum widths of construction access roads that Dairyland Power Cooperative and/or NextEra Transmission or their subcontractors have used when constructing a 765 kV line.
8. From a prior Dairyland Power Cooperative and/or NextEra Transmission 765 kV project, documentation of all access road designs through all stages including: the weights of all equipment used, descriptions of all conditions requiring topsoil excavation, descriptions of all measures used to avoid soil compression, descriptions of all measures used for water management, a list of all toxic and other specially handled liquids and materials used, and a list of all materials or chemical applications that were abandoned.
9. Documentation of site archaeology investigations that Dairyland Power Cooperative and/or NextEra Transmission or their subcontractors have conducted when constructing a 765 kV line.
10. Vegetation management documentation and sample contracts describing practices that have been utilized by Dairyland Power Cooperative and/or NextEra Transmission for previous 765 kV lines including techniques used to prevent soil erosion on steep grades.
11. If not specified in above documentation, documentation describing no-spray and other easement vegetation management accommodations that would be offered for organic farming and other conservation activities such as prairie and forest restoration.
12. Documentation of construction practices used in prior 765 kV projects to minimize damage to wetland and pond habitats.
13. Documentation of all siting and other accommodations that Dairyland Power Cooperative and/or NextEra Transmission have previously made to reduce noise and light pollution associated with corona discharge from a 765 kV transmission line passing humid areas.
14. Documentation from a proposed or existing 765 kV transmission line that Dairyland Power Cooperative and/or NextEra Transmission or assigned subcontractor have made accounting for average Sound Pressure Levels at specified distances (in feet), under specified humidity/precipitation conditions and at specified transmission loads (in megawatts).
15. Documentation from a proposed or existing 765 kV transmission line that Dairyland Power Cooperative and/or NextEra Transmission or assigned subcontractor have previously made accounting for magnetic field strength readings at specified distances (in feet) and at specified transmission loads (in megawatts).
16. Documentation of all siting and other accommodations that Dairyland Power Cooperative and/or NextEra Transmission have previously made to reduce waterfowl, raptor, grassland bird and songbird collisions with a 765 kV transmission line.
17. Documentation of all siting and other accommodations that Dairyland Power Cooperative and/or NextEra Transmission have previously made to reduce risk of arcing from a 765 kV transmission line igniting fires in grasslands and forests.
18. Estimated date that the Application for the 765 kV project is expected to be submitted to the Public Service Commission of Wisconsin.

19. Estimated, forty-year, capital cost for the proposed, "Maribell" segment of the 765 kV transmission project for a Richland Electric Cooperative, Vernon Electric Cooperative and Scenic Rivers Electric Cooperative member-owner based on average use of 1000 kWh / month.
20. Documentation accounting for MISO consideration and decision-making concerning the alternative use of HVDC transmission such as the SOO Green HVDC Link, instead of 765 kV transmission and the potential HVDC routes that were considered.
21. A list of the types of "significant economic development benefits," that the Project would deliver to local economies in Vernon, Crawford and Richland Counties.
22. Documentation from MISO Tranche 2.1 planning estimating the percentage of electrical power assumed to be provided from distributed solar and distributed battery storage resources in years 1, 10 and 20 under all planning futures.
23. A list with project names and locations of 765 kV transmission projects that Dairyland Power Cooperative and NextEra Transmission have previously proposed and installed-- independently and together.
24. Provide any studies conducted on impacts to plants, birds, mammals and any other species of concern present in our area.
25. Complete and provide a report of a balloon test along the entire length of the proposed 765 kV transmission line in the presence of the Ho Chunk Nation and Kickapoo Valley Reserve representatives.

AND, BE IT FURTHER RESOLVED, that the Kickapoo Valley Reserve hereby approves this resolution ADOPTED this 3 day of December, 2025.

Signature _____

Title: Chair

Attested by James J. Lewis KVR EXECUTIVE DIRECTOR

on this 3 day of December, 2025.

Kickapoo Valley Reserve Contact Email Address: Kickapoo.reserve@krm.state.wi.us

Dairyland Power Cooperative

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