

BEFORE THE
PUBLIC SERVICE COMMISSION OF WISCONSIN

Application of Midcontinent Grid Solutions
Wisconsin, LLC for Authority to Become an Electric
Public Utility

2708-NC-100

LAKE WISCONSIN LAND AND COMMUNITY ALLIANCE, INC.
REQUEST TO INTERVENE AND NOTICE OF APPEARANCE

Pursuant to Wis. Stat. § 227.44 and Wis. Admin. Code PSC § 2.21, Lake Wisconsin Land and Community Alliance, Inc. (“LWLCA”), by and through its attorneys, requests to intervene, to be admitted as a full party in the above-captioned proceeding, and to appear by the counsel identified below. LWLCA further requests that the Public Service Commission of Wisconsin (the “Commission”) designate the proceeding as a contested case and conduct a public hearing.

1. LWLCA is a non-stock corporation whose supporting members are landowners in the area in the vicinity of one of the proposed routes (Segments 13, 14, and 17) of the above-captioned Applicants’ 765 kV transmission line project known as BECI. The supporting members of LWLCA whose land would be directly impacted by the Applicants’ transmission line should it be constructed in conformity with one of the routes currently under consideration, have significant interests in the above-captioned matter.

2. In order to demonstrate standing, LWLCA states that many of its supporting members and officers own land where their family home is located, where their farms are

located, and where they recreate and enjoy the aesthetics and beauty of the land and waters of the state.

3. If this Project is built on the segments 13, 14, or 17, then there will be significant facilities, up to and possibly including a 150-200 foot tall transmission towers with 765 kV wires, built adjacent to or on some of their property. This would cause significant impacts to some of their homes, farms, and lands including aesthetic impacts, substantial elimination of trees and landscaping, possible health impacts, potential residential relocations, agricultural impacts and possible agricultural relocations, de facto destruction of iconic natural monuments such as Gibraltar Rock, and significant property value impacts.

4. For reasons that remain unclear, the above-captioned applicant has proposed routing for its 765 kV BECI project in a way that contravenes the routing rules set forth in Wis. Stat. § 1.12(6) and impermissibly creates new transmission line corridors in greenfield.

5. The above-captioned applicant's unlawful proposal for greenfield transmission line construction in violation of Wis. Stat. § 1.12(6) is reason to question whether they should be granted authority to become an electric public utility.

6. LWLCA has a substantial interest in the outcome of this proceeding, which cannot be adequately represented by any other party due to the fact that if segments 13, 14, or 17 of the project is permitted, there will be direct and severe impacts to the environmental, cultural, historical characteristics / attributes of LWLCA members' lands, interests, property rights, value of property, and human rights. LWLCA will not be directly impacted however if the applicant is not granted Electric Public Utility status because then no CPCN will be granted for the BECI project, and the LWLCA lands will not be impacted because any future project would likely follow the routing criteria set forth in Wis. Stat. § 1.12(6). Therefore the potential for impacts on

LWLCA is directly related to the decision and order of the Commission in the above-captioned matter. Accordingly, LWLCA will be affected by any order issued by the Commission in the above-captioned proceeding.

7. LWLCA's participation in this docket will bring forth information about the Application under consideration that will assist the Commission in its decision-making.

8. Petitioner LWLCA agrees to accept service by electronic means through its counsel, the undersigned hereby appears for LWLCA, and requests to be added to the service list as counsel for LAKE WISCONSIN LAND AND COMMUNITY ALLIANCE, INC.:

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WHEREFORE, LWLCA prays that it be granted leave to intervene and become a party to the above-captioned proceeding with the full powers and rights granted to such parties.

Respectfully submitted,
EMINENT DOMAIN SERVICES, LLC

/s/ Erik S. Olsen
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Counsel for LAKE WISCONSIN LAND
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CERTIFICATE OF SERVICE

I hereby certify that copies of the foregoing Petition to Intervene of LWLCA was served upon all current parties and upon the Commission this 9th day of September, 2026.

/s/ Erik S. Olsen

Erik S. Olsen