

**BEFORE THE
PUBLIC SERVICE COMMISSION OF WISCONSIN**

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

Docket No: 2708-NC-100

**RESPONSE OF MIDCONTINENT GRID SOLUTIONS WISCONSIN, LLC,
TO LAKE WISCONSIN LAND AND COMMUNITY ALLIANCE, INC.'S
REQUEST TO INTERVENE AND NOTICE OF APPEARANCE**

Pursuant to Wis. Admin. Code §§ PSC 2.23 and 2.05, Midcontinent Grid Solutions Wisconsin, LLC (“MGS Wisconsin”) hereby responds to the Motion to Intervene by Lake Wisconsin Land and Community Alliance, Inc. (“LWLCA”).¹ MGS Wisconsin respectfully requests the Public Service Commission (“Commission”) deny LWLCA’s Motion to Intervene as premature, as it raises issues that are reserved for the Commission’s Certificate of Public Convenience and Necessity (“CPCN”) process and will not be addressed in this proceeding.² MGS Wisconsin appreciates that members of the public, including groups like LWLCA, take the time and interest to engage in the routing and siting of the yet-to-be filed Bell Center-Columbia-Sugar Creek transmission project (the “BECI Project”). While this proceeding is not the appropriate venue for these conversations, MGS Wisconsin welcomes members of the public’s participation both during the formal CPCN process and the pre-CPCN filing route feedback discussions that are currently ongoing. Furthermore, MGS Wisconsin renews its request that the Commission issue a Notice of Proceeding to promote the timely disposition of the issues.

¹ Lake Wisconsin and Community Alliance, Inc. Request to Intervene and Notice of Appearance (Sept. 9, 2026) (PSC REF # 609696) (Motion to Intervene).

² See Wis. Stat. § 196.491.

I. LWLCA's Interests in the Siting and Permitting of the BECI Project are Premature.

LWLCA asserts that itself and its members have substantial interests that establish a right to intervene and become a full party to this proceeding under Wis. Admin. Code § PSC 2.21 because they own property and engage in recreation “in the vicinity of one of the proposed routes,” which LWLCA describes as “(Segments 13, 14, and 17)” of the BECI Project.³ LWLCA also asserts concerns regarding potential environmental and agricultural effects associated with the LWLCA's asserted route segments.⁴ MGS Wisconsin has reviewed LWLCA's routing, environmental, and agricultural interests, and LWLCA certainly has articulated an interest that would justify its participation in a future CPCN proceeding. But LWLCA's request to intervene does not seem to contain a substantial interest that the Commission could address in this proceeding, which centers on whether MGS Wisconsin meets the definition of a “public utility” under Wis. Stat. § 196.01(5)(a) and the criteria to be granted a Certificate of Authority (“CA”) to transact public utility business under Wis. Stat. § 196.49(1)(am).

For that inquiry, the Commission will likely examine the financial strength and corporate structure of the applicant, what underlying reporting and financial obligations are appropriate, whether and which rate regulation and reliability standards may apply to the project, and future oversight conditions of MGS Wisconsin as a Wisconsin public utility. To the extent LWLCA can demonstrate a substantial interest in those issues, its request to intervene may be warranted; but as of now, its request to address routing, environmental, and agricultural issues is premature.⁵

³ Motion to Intervene at ¶ 1.

⁴ *Id.* at ¶¶ 2-3, 6.

⁵ See generally, *Application of ITC Midwest LLC for Authority to Become an Electric Utility Final Decision and Certificate of Authority*, Docket No. 2707-NC-100 (May 8, 2014) (PSC REF#: 204180) (not addressing routing, agricultural or environmental issues in its decision authorizing a CA).

LWLCA is also premature in its assertion that the BECI Project will not be constructed if the Commission does not grant MGS Wisconsin's request in this proceeding. The Midcontinent Independent System Operator, Inc. (MISO) determined through its regional transmission-planning process that the BECI Project is needed and selected it as part of MISO's MTEP24 Tranche 2.1 portfolio.⁶ Thus, denial of MGS Wisconsin's request for authority to transact public utility business would not eliminate the regional transmission need identified by MISO or establish that the BECI Project will not be constructed.

While LWLCA has not requested permissive intervention, the premature nature of the assertion of its interest and the type and character of information that it would likely present to the Commission in this proceeding may not promote the timely disposition of the issues in this proceeding. The assertion of route preferences, environmental and agricultural effects, and design and construction preferences and impacts will only serve to unnecessarily expand and confuse the record in this proceeding with the future CPCN proceeding and will likely delay the timely conclusion of this docket. As a result, LWLCA likely should not be admitted as a permissive intervenor.

II. The Commission Should Issue a Notice of Proceeding in this Docket.

In responding to the intervening utilities, MGS Wisconsin argued those interventions were premature, and this request by LWLCA is premature as well. MGS Wisconsin accordingly re-emphasizes its request for the Commission to issue a Notice of Proceeding in this docket and set an intervention deadline so that the Commission's Administrative Law Judge can rule on those interventions as is Commission practice. MGS Wisconsin recognizes that the public has a notable interest in the development of its proposed Project.

⁶ *Application of Midcontinent Grid Solutions Wisconsin, LLC for a Certificate of Authority to Operate as a Public Utility in Wisconsin*, Docket No. 2708-NC-100, at 17, 24–27 (June 4, 2026) (PSC REF#: 593329).

III. Conclusion

For the foregoing reasons, MGS Wisconsin respectfully requests that the Commission deny LWLCA's motion and issue the notice of proceeding in this docket as soon as practicable.

Respectfully submitted this 23 day of September 2026.

/s/ Jordan J. Hemaïdan

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