

**BEFORE THE  
PUBLIC SERVICE COMMISSION OF WISCONSIN**

Application of American Transmission Company LLC, as an Electric Public Utility, for a Certificate of Public Convenience and Necessity to Construct and Operate the Mill Road-Granville Transmission Line Project, Consisting of Two New 138 kV Transmission Lines, Rebuilding Two Existing Double-Circuit 345/138 kV Transmission Lines, and Constructing the 345 kV Mill Road Substation Located Primarily in the City of Milwaukee, Milwaukee County and the City of Brookfield and the Village of Menomonee Falls, Waukesha County, Wisconsin

Docket No. 137-CE-212

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**AFFIDAVIT OF JOHN SAGONE**

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I, John Sagone, being first duly sworn on oath, depose and state, as follows:

1. I am an employee of ATC Management Inc. I hold the position of Manager State Regulatory Affairs and Associate General Counsel, and I am authorized to sign this affidavit on behalf of American Transmission Company LLC, and its corporate manager, ATC Management Inc. (collectively "ATC").

2. This request for confidential handling is made on behalf of ATC, the corporate headquarters of which is at W234 N2000 Ridgeview Parkway Court, Waukesha, Wisconsin.

3. ATC is filing this request for confidential handling with its Response to Data Request PSCW-Watson-1.

4. The subject of ATC's request for confidential handling contains the following:

- Power flow models listed on Exhibit A.

5. Certain technical information in the aforementioned documents, as well as the power flow models, could be useful to someone planning an attack on ATC's critical energy infrastructure, and the information goes beyond the physical location of the facilities. Information of this type is considered Critical Energy Infrastructure Information ("CEII") under federal law, and ATC is bound to protect it. *See* FERC Orders No. 630, 68 Fed. Reg. 9857 (2003), and No. 683, 71 Fed. Reg. 58,273 (2006); 18 C.F.R. § 388.113. ATC has adopted a procedure entitled "Identification and Protection of CEII Materials" consistent with these legal requirements and has determined that the information in the document and models includes CEII. In accordance with this procedure, ATC is filing this information confidentially.

6. Holding confidential the information describing certain details of the electric transmission system supports the public interest in continued protection of the physical security of the electric transmission system and in maintaining a fair and competitive wholesale electric market that does not favor any particular market participant. Disclosure of this information may lead to the harm and diminishment of secure, equitable, and competitive energy markets in the State of Wisconsin.

7. Certain of the information in the aforementioned documents also contains business confidential information. This information should be treated as confidential information under Wis. Stat. § 134.90(1)(c), subch. II, Ch. 19 of the Wisconsin Statutes, and Wis. Admin. Code PSC § 2.12 because the information supplied by ATC contains information that is confidential, represents the trade secrets or proprietary business information of ATC or others and should therefore be protected from disclosure.

8. No public benefit extends from the disclosure of the aforementioned information. Any disclosure of this information would be to the potential detriment of the possessor and the general public.

9. ATC is providing this information to facilitate the Commission's review of the need for the Project and demonstrate that ATC's plans to address these energy needs are in the public interest.

10. The above and foregoing is true and correct to the best of my personal knowledge and belief.

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John Sagone  
Manager State Regulatory Affairs and  
Associate General Counsel

Subscribed and sworn to before me this  
\_\_\_\_ day of \_\_\_\_\_, 2024

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Notary Public, State of Wisconsin  
My Commission ends: \_\_\_\_\_

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Response to Data Request PSC-Watson-1

**Data Request No. PSCW-KG-1.1:**

(Application page 13/115, Section 1.4, AFR Section 1.4): Specify any associated facilities and any potential construction activities that would cross or potentially impact the project.

**Response to Data Request No. PSCW-KG-1.1:**

ATC is not aware of any associated facilities and any potential construction activities that would cross or potentially impact the project.

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**Data Request No. PSCW-KG-1.2:**

(Application page 31/115, Section 1.8.1, AFR Section 1.8.1): Provide separate construction schedules for each segment or spread of the proposed project. Include a timeline showing construction activities from beginning of construction to in-service. Identify all critical path items.

**Response to Data Request No. PSCW-KG-1.2:**

At this time ATC does not have any more detailed schedule information than what was provided in Sections 1.8.1, 1.8.2, 1.8.3, and 1.8.4. Detailed construction schedules will be established after the PSCW's order is received.

Critical path items include:

- Regulatory authorizations
- Establish available outage windows
- Easement acquisition
- Material deliveries
- Issue drawings and specifications for construction
- Complete construction

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**Data Request No. PSCW-KG-1.3:**

(Application page 31/115, Section 1.8.2, AFR Section 1.8.2): Provide any documentation pertaining to discussions with Midcontinent Independent System Operator, Inc. (MISO) or generation facility owners about the outage constraints identified.

**Response to Data Request No. PSCW-KG-1.3:**

ATC has not had any discussions regarding outages. These discussions will take place closer to the start of construction.

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**Data Request No. PSCW-KG-1.4:**

(Application page 37/115, Section 2.2.3, AFR Section 2.2.3.): Provide the estimated electrical losses for each alternative in annual gigawatt-hours (GWh).

**Response to Data Request No. PSCW-KG-1.4:**

See Table F.2 in Appendix F of Appendix D, Exhibit 1 (Project Scoping Document) of the Application. Loss calculations in GWH were completed for only alternative 1.

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**Data Request No. PSCW-KG-1.5:**

(Application page 37-38/115, Section 2.2.3., AFR Section 2.2.3.4.): For each of the generator interconnections identified in Appendix D Table 1, provide the costs associated with any interconnection upgrades and how those cost shares relate to this proposed project, if at all.

**Response to Data Request No. PSCW-KG-1.5:**

For each of the generators in the MISO DPP 2020 Cycle East (ATC) Area, the interconnection upgrade costs driven by the MISO generation deliverability study are documented on the “2020 ATC Deliverability Summary” tab (Column H) in Appendix D Table 1.

MISO DPP need is one of the primary need drivers for the proposed project. The proposed project was identified as a required network upgrade for fourteen DPP 2020 cycle generators in MISO East (ATC) area as shown on the “DPP2020-Restudy\_Cost\_Allocation” tab in Appendix D Table 1. However, the proposed project has zero cost allocations to the fourteen generators due to the reasons below.

The proposed project was submitted to the MISO MTEP prior to the completion of the MISO DPP 2020 System Impact Study. As described in the MISO Generation Interconnection Business Practices Manual (BPM) 15, “to mitigate a constraint, MISO will check the MTEP appendices and discuss with the impacted TO(s) to determine if there already exists a planned project which will alleviate the constraint.” And “[i]f a project(s) resolves the constraint, and that project(s) is approved by the Board within (1) calendar year of the GIA execution or execution of an amendment thereof, then the IC will not be responsible for upgrade(s) that would resolve the constraint, but the MTEP project will be included as a GIA contingent facility.” The fourteen generators meet these BPM-15 requirements. The proposed project was approved by the MISO Board on December 12, 2024, which is within (1) calendar year of the fourteen GIA executions ranging between February 2024 and November 2024.



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**Data Request No. PSCW-KG-1.6:**

(Application page 42/115, Section 2.10, AFR Section 2.10): Other than the Oak Creek Power Plant, identify whether there are any other anticipated generator retirements larger than 50 megawatt (MW) in the MISO load resource zone in which the project is being proposed for a period of five years prior to project energization. Describe how the Oak Creek Power Plant retirement and any other retirements identified may affect the need for the proposed project.

**Response to Data Request No. PSCW-KG-1.6:**

Based on Attachment Y retirements officially approved by MISO at the time of this data request, Table 1 below shows all other anticipated generator retirements larger than 50 MW in the MISO Load Resource Zone (LRZ) 2 from 2022 to 2027 (i.e., the five years prior to the proposed Mill Road – Granville project energization date of October 1, 2027).

Table 1

Local Balancing Authority in MISO LRZ 2	Unit Description	Point of Interconnection	Pmax (MW)	Suspension Date Based on MISO Approved Attachment Y

The need for the proposed project identified in Section 3.2 (Power Flow Analysis) of Appendix D Exhibit 1 (Project Scoping Document) would not be impacted by [REDACTED] retirement and [REDACTED] retirement because both units were already offline in all study models used in the power flow analysis in Section 3.2 of Appendix D Exhibit 1.

ATC also does not expect that the [REDACTED] retirement and [REDACTED] retirement would reduce the need of the proposed project.

- Depending on the study model year, some of [REDACTED] Units and [REDACTED] Units were still dispatched following MISO's generator suspension modeling rule. Suspension units that have not yet retired and have an approved Attachment Y are modelled offline three years after the suspension date. For study models beyond the three-year window, the suspension units are dispatched assuming Generator Owners not rescinding interconnection rights.

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- Located southeast of the Granville – Bluemound corridor, [REDACTED] generation are tightly connected to the 345 kV and 138 kV networks in the study area and has been an [REDACTED] retirement would only further exacerbate the system limitations as identified in Section 3.2 of Appendix D Exhibit 1 (Project Scoping Document).
- Compared to [REDACTED] generation, [REDACTED] generation has a much lower generation shifting factor on the Granville - Bluemound corridor. If [REDACTED] generation retires as planned, the group of new generation from the MISO DPP-20 cycle, with signed generator interconnection agreements and with a total MW capacity much higher than the [REDACTED] units, is expected to exacerbate the thermal constraints on this corridor. In fact, the proposed project was identified as a required network upgrade for fourteen DPP 2020 cycle generators siting north and west of the Project study area.

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**Data Request No. PSCW-KG-1.7:**

(Application page 42/115, Section 2.10, AFR Section 2.10): Discuss any generator additions larger than 50 MW with signed Generator Interconnection Agreements and/or Interconnection Service Agreements in the project study area. Describe how those generator additions may affect the need for the proposed project.

**Response to Data Request No. PSCW-KG-1.7:**

Since ATC's filing of the project application, there has been only one generator addition (J1778) located in the Project study area that obtained a signed Generator Interconnection Agreement. J1778 is a 100 MW solar project at the Paris 138 kV from the MISO DPP 2020 cycle. J1778 was included in the MISO DPP 2020 System Impact Study as a cluster study. J1778 does not affect the need for the proposed Project.

MISO DPP need is one of the primary need drivers for the proposed Project. Based on MISO's generation deliverability study methodology, the DPP 2020 Cycle System Impact Study identified the proposed project as a required network upgrade for fourteen (14) generators to mitigate the generation deliverability constraints in the Western Milwaukee area. These fourteen (14) new generators being sited north and west of the study area exacerbate the existing high north-to-south power flow on the Granville – Bluemound corridor. Please refer to the "DPP2020-Restudy\_Cost\_Allocation" tab in Appendix D Table 1 on the list of the fourteen (14) generators in MISO East (ATC) area. 1778 is not one of the fourteen (14) generators contingent on the proposed Project.

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**Data Request No. PSCW-KG-1.8:**

(Application page 22/115, Section 1.6.6, AFR Section 1.6.6): Provide a table that provides the following information for each route segment, broken out by route segment, for both the proposed and alternative route:

- a. Voltage
- b. Structure type
- c. Segment length
- d. Replacement/new construction

**Response to Data Request No. PSCW-KG-1.8:**

Items a and b are presented in Table 5.3.1-1. Items c and d have now been added to the table below.

Segment	Structure Type	Transmission Configuration	Transmission Conductor	Span Length	Affected Existing Distribution	ROW Sharing	Preliminary Structure QTY	Segment Length (ft)	Replacement /New Construction
A	Mono-Pole Steel 138 kV	Single-Circuit Vertical	TP-556.5 kcmil (26/7) "Dove" ACSR	390 FT to 1190 FT (Typical)	N/A	Yes	19	9,377	New
C	Mono-Pole Steel 345 kV/345 kV	Double-Circuit Vertical	TP-556.5 kcmil (26/7) "Dove" ACSR	390 FT to 1190 FT (Typical)	No	Yes	12	23,920	Replacement
D	Mono-Pole Steel 345 kV/345 kV	Double-Circuit Vertical	2156 kcmil (84/19) "Bluebird" ACSR	590 FT to 1190 FT (Typical)	Yes	Yes	11	36,422	Replacement
E	Mono-Pole Steel 138 kV	Single-Circuit Vertical	TP-556.5 kcmil (26/7) "Dove" ACSR	200 FT to 650 FT (Typical)	N/A	NO	9	5,002	New
F	Mono-Pole Steel 345	Double-Circuit Vertical	Bundled-TP-477 kcmil (26/7) "Hawk" ACSR	250 FT to 1150 FT (Typical)	No	Yes	7	4,830	Replacement /New

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	kV/345 kV								
G	Mono-Pole Steel 138 kV	Single-Circuit Vertical	TP-556.5 kcmil (26/7) "Dove" ACSR	350 FT to 1000 FT (Typical)	Yes	Yes	34	16,086	New
I	Mono-Pole Steel 345 kV/345 kV	Double-Circuit Vertical	Bundled-TP- 477 kcmil (26/7) "Hawk" ACSR	250 FT to 1150 FT (Typical)	No	Yes	22	19,728	Replacement /New
J	Mono-Pole Steel 138 kV	Single-Circuit Vertical	TP-556.5 kcmil (26/7) "Dove" ACSR	350 FT to 1000 FT (Typical)	Yes	No	27	13,854	New
K	Mono-Pole Steel 345 kV/345 kV	Double-Circuit Vertical	Bundled-TP- 477 kcmil (26/7) "Hawk" ACSR	250 FT to 1150 FT (Typical)	No	Yes	26	14,672	Replacement /New
L	Mono-Pole Steel 138 kV	Single-Circuit Vertical	TP-556.5 kcmil (26/7) "Dove" ACSR	350 FT to 1000 FT (Typical)	Yes	No	14	7,754	New
M	Mono-Pole Steel 138 kV	Single-Circuit Vertical	TP-556.5 kcmil (26/7) "Dove" ACSR	350 FT to 1000 FT (Typical)	Yes	Yes	2 (Proposed)/ 3 (Alternative)	583	Replacement
N	Two Mono-Pole Steel 138 kV/ 138 kV	Single-Circuit Vertical & Double-Circuit Vertical	TP-556.5 kcmil (26/7) "Dove" ACSR	350 FT to 1000 FT (Typical)	No	Yes	5	3,567	Replacement
O	Mono-Pole Steel 138 kV	Single-Circuit Vertical	TP-556.5 kcmil (26/7) "Dove" ACSR	350 FT to 1000 FT (Typical)	No	No	9	4,518	New

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P	Two Mono- Pole Steel 138 kV/ 138 kV	Single-Circuit Vertical & Double-Circuit Vertical	TP-556.5 kcmil (26/7) “Dove” ACSR	350 FT to 1000 FT (Typical)	No	Yes	15 (Proposed)/ 20 (Alternative)	3,768	Replacement
R	Mono- Pole Steel 138 kV/138 kV	Single-Circuit Vertical & Double-Circuit Vertical	TP-556.5 kcmil (26/7) “Dove” ACSR	150 FT to 900 FT (Typical)	No	Yes	5	2,790	Replacement /New

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Response to Data Request PSC-Watson-1

**Data Request No. PSCW-KG-1.9:**

(Application page 35/115, Section 2.1, AFR Section 2.1): Identify the existing facilities that are approaching the end of their useful lives and would be replaced as part of the proposed project. Provide supporting evidence that these facilities require asset renewal.

**Response to Data Request No. PSCW-KG-1.9:**

Existing assets are not being replaced due to end of life. The existing assets are being replaced because they are not designed to support the larger conductor required for this Project. Asset renewal is not a need driver on this Project.

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Response to Data Request PSC-Watson-1

**Data Request No. PSCW-KG-1.10:**

Provide the estimated costs for the proposed and alternative route with the estimated contingency cost broken out as a separate line item.

**Response to Data Request No. PSCW-KG-1.10:**

Please see the Response to Data Request No. PSCW-KG-1.11.



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**Data Request No. PSCW-KG-1.11:**

Describe the applicant's method for calculating contingency costs and provide an itemized breakdown of contingency costs, by category or function. Additionally, provide justification for calculating the contingency costs in this manner.

**Response to Data Request No. PSCW-KG-1.11:**

An application for PSCW approval of a project is filed very early in a project's overall development timeline. Because of this, a contingency amount (20%) was applied across the board to all line items in the cost estimate for this Project. Once ATC receives approval from the PSCW, the detailed design phase of the Project begins and ATC can finalize structure placement (if applicable), begin outage coordination, and order materials. Following the completion of outage coordination, ATC next schedules construction activities.

As the Project progresses through its timeline, the amount of contingency is reviewed and may be reduced as key activities are completed. For example, in the time in between preparing the estimates for a filing and the receipt of an order, commodity costs can fluctuate significantly. Once final engineering for the Project is completed and the steel is ordered, the amount of contingency is reduced. On the other hand, contingency costs for labor may be increased until outage availability is confirmed, and ATC is able to determine the appropriate level of necessary labor.

ATC has found that it is difficult to determine if/when contingency dollars may need to be used, and often, the contingency associated with one line item may not be necessary. However, contingency dollars greater than what was associated with other line items may exceed the budgeted amount. Thus, ATC initially applies an across-the-board amount to allow for flexibility throughout the Project.

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**Data Request No. PSCW-KG-1.12:**

Provide a further breakdown of project costs by route segment and by substation. Within each of these categories, include:

- Material costs
- Labor costs
- Other costs
- Operation and Maintenance Costs

Keep the estimated contingency cost, pre-certification cost, and high-voltage transmission impact fees broken out as separate line items

**Response to Data Request No. PSCW-KG-1.12:**

ATC does not prepare cost estimates broken down by segment.

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Response to Data Request PSC-Watson-1

**Data Request No. PSCW-KG-1.13:**

(Application page 48/115, Section 4.2., AFR Section 4.2.): For 345 kilovolt (kV) projects: Provide a summary table of total costs (transmission and substation) for each proposed route, broken down by the following voltage classes.

- 345 kV
- Less than 345 kV
- Distribution

**Response to Data Request No. PSCW-KG-1.13:**

Please see Section 7.10 of the Application. ATC does not have any distribution facilities.

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Response to Data Request PSC-Watson-1

**Data Request No. PSCW-KG-1.14:**

(Application page 22/115, Section 1.6.6, Transmission AFR Section 1.6.6): State whether all project transmission facilities would be overhead configurations. Describe the range of conductor heights, and general changes in structure sizes for existing structures that would be replaced. State whether all existing structures in the project area would be replaced, or if certain existing structures would be modified.

**Response to Data Request No. PSCW-KG-1.14:**

All Project-related transmission facilities will be overhead configurations. In general, the range of conductor heights and changes in structure sizes for existing structures being replaced is an increase of between 0-10 feet. Not all existing structures in the Project area are being replaced. The existing lattice structures from Granville to Mill Road (segments F, I, and K) are being replaced. Generally, the existing structures in segments P, N and M will be replaced. The existing structures in segments D and C will be a combination of replacements and modifications. Existing structures near the Mill Road Substation will be removed as required to bring the circuits into the substation.

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Response to Data Request PSC-Watson-1

**Data Request No. PSCW-KF-1.15:**

(Application page 29/115, Section 1.7.4, Transmission AFR Section 1.7.4.3): Identify abandoned railroad right-of-ways (ROW) that are crossed or shared by route segments.

**Response to Data Request No. PSCW-KF-1.15:**

Segment C (existing transmission lines L-CYP31 & 2661) crosses an abandoned railroad turned to bike/walk trail just south of Custer Lane.

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Response to Data Request PSC-Watson-1

**Data Request No. PSCW-KF-1.16:**

(Application page 30/115, Section 1.7.5, Transmission AFR Section 1.7.5.3): State if any discussions occurred with pipeline operators pertaining to acceptable ROW crossing or sharing.

**Response to Data Request No. PSCW-KF-1.16:**

ATC has identified pipeline operators in the areas and had initial discussions with some of those pipeline operators. ATC will have further discussions with pipeline operators after receipt of a PSCW order in this Docket.

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Response to Data Request PSC-Watson-1

**Data Request No. PSCW-KF-1.17:**

(Application page 30/115, Section 1.7.5, Transmission AFR Section 1.7.5.4): State if any discussions occurred with pipeline operators pertaining to maintaining safety and reliability of the pipeline during transmission construction.

**Response to Data Request No. PSCW-KF-1.17:**

Please see Response to Data Request No. PSCW-KF-1.16.

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Response to Data Request PSC-Watson-1

**Data Request No. PSCW-KF-1.18:**

(Application page 43/115, Section 3.1, Transmission AFR Section 3.1): Provide Magnetic Field Profile data in PSC Impact Table 6 as an Excel file.

**Response to Data Request No. PSCW-KF-1.18:**

Magnetic Field Profile data in PSC Impact Table 6 are provided as Excel files (Segments 1-56 EMF Results Tables).



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Response to Data Request PSC-Watson-1

**Data Request No. PSCW-KF-1.19:**

(Application page 43/115, Section 3.1, Transmission AFR Section 3.1): Provide Appendix G Magnetic Field Report in multiple submissions at higher resolution to make the Substation Magnetic Field Evaluation report (EMF) schematics legible.

**Response to Data Request No. PSCW-KF-1.19:**

A revised Appendix G with higher resolution plans of Butler, Granville and Tamarack are provided. Individual plan view files are provided as well.

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Response to Data Request PSC-Watson-1

**Data Request No. PSCW-KF-1.20:**

(Application page 43/115, Section 3.1, Substation AFR 3.1): Provide magnetic field readings for existing substations in the area from the fence outward to the property boundary or 150 feet, whichever is the shortest distance as follows:

- i. (3.1.1) At each corner of the fence line and outward toward the property perimeter at 25-foot intervals.
- ii. ii. (3.1.2) At the midpoint along each linear fenced section and outward toward the property perimeter at 25-foot intervals.
- iii. iii. (3.1.3) At the fence line where existing overhead or underground electric lines cross the fence.

**Response to Data Request No. PSCW-KF-1.20:**

The substation EMF values are provided in Appendix G, Exhibit 1. Substation information is found on the following pages:

- Butler – p. 120
- Granville – p. 124
- Mill Road – p. 128 (calculated)
- Tamarack – p. 137

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**Data Request No. PSCW-KF-1.21:**

(Application page 43/115, Section 3.2, Transmission AFR Section 3.2): Provide the magnetic field information in PSC Table 6 for each magnetic field scenario for one year post-construction and ten years post-construction.

**Response to Data Request No. PSCW-KF-1.21:**

Please see Appendix G, Exhibit 1 (pages 6-18 of the EMF Report). Some of the existing conditions change for future years, so these scenarios were split into two exhibits. Pages 6-18 shows how the existing and proposed exhibits companion each other. The following table relates existing figures with their companion proposed figures when applicable.

EXISTING FIGURE	PROPOSED COMPANION FIGURE
1	25
2	26
3	27
4	28
5	29
6	30
7	31
8	32
9	33
10	35
11	36
15	48
16	49
17	50
18	51

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**Data Request No. PSCW-KF-1.22:**

(Application page 52/115, Section 5.2, Transmission AFR Section 5.2.2): For each project segment, describe changes to the location or width of existing electric ROW.

**Response to Data Request No. PSCW-KF-1.22:**

In general, ATC will attempt to maintain the location and width of existing ROWs. Final changes will be determined during the detailed design stage of the Project. The final widths will be calculated according to ATC's standards to ensure safety and reliability.

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Response to Data Request PSC-Watson-1

**Data Request No. PSCW-KF-1.23:**

(Application page 52/115, Section 5.2, Transmission AFR Section 5.2.3): For each project segment, describe the potential issues and impacts that may be encountered with regard to the shared existing ROW by constructing the proposed facilities.

**Response to Data Request No. PSCW-KF-1.23:**

In general, potential issues regarding shared existing ROW are conflicts and long-term maintenance. ATC will work with third party facilities to mitigate conflicts and ensure long-term maintenance needs are met.

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**Data Request No. PSCW-KF-1.24:**

(Application page 52/115, Section 5.3, Transmission AFR Section 5.3.2.8): For each route segment indicate if an off-set is needed for rebuild sections to be built in the same ROW. If so, describe the offset.

**Response to Data Request No. PSCW-KF-1.24:**

An offset is needed for rebuild sections to be built in the same ROW. The offset is needed to meet clearance requirements, allow room for construction and long-term maintenance, and avoid transmission line ROW overlap with existing railroad ROW. While structures are typically located in existing ROW for rebuilt sections, additional ROW is needed to accommodate the offsets and conductor blowout conditions. Please see Appendix B, Table 1 for ROW sharing characteristics of each segment.

The following table shows segments in rebuild sections of the project.

<b>Segment (APPROXIMATE LOCATION)</b>	<b>Approximate Offset Range (FEET)</b>
C	0'-20' EAST/WEST
D	0'-20' EAST/WEST
F	0'-10' SOUTH
I (LILLY ROAD –EAST END OF SEGMENT)	0'-40' NORTH
I (TAMARACK-LILLY ROAD)	0'- 30' SOUTH
K (HWY 175 -N 91 <sup>ST</sup> ST )	0'-40' SOUTH
K (N 91 <sup>ST</sup> ST-GRANVILLE SS )	0'-60' NORTH
K (START OF SEGMENT K-HWY 175)	0'-40' NORTH
M, N, P	0'-5' WEST
R	0'-10' SOUTH

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**Data Request No. PSCW-KF-1.25:**

(Application page 52/115, Section 5.3, Transmission AFR Section 5.3.2.9): Describe the shared ROW configuration for each route segment.

**Response to Data Request No. PSCW-KF-1.25:**

As described in Section 5.1, ATC's routing and siting process prioritized the use of existing utility and transportation corridors. When siting structures on route segments following roads and highways, ATC typically located structures approximately eight to ten feet onto private property where possible. For segments following railroads, ATC typically located structures a distance away from the railroad to avoid overlap of the railroad and transmission line ROW.

Structures may be located further onto private property for a variety of reasons such as conflicts with buried utilities, grade changes near the road ROW edge, sudden changes in width/location of the road ROW, sudden changes in the width/location of the railroad ROW, to maintain railroad set back and crossing requirements, to maintain clearance to obstacles (such as WisDOT bridges/overpass), and to be outside of WisDOT clear zone requirements.

Please see Appendix B, Table 1 for ROW sharing characteristics of each segment.

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Response to Data Request PSC-Watson-1

**Data Request No. PSCW-KF-1.26:**

(Application 52/115, Section 5.2, AFR Section 5.2.4.): State whether the existing easements are to be renegotiated and/or rewritten. If so, indicate the reason (for example language modernization, change in easement size, change in transmission, etc.).

**Response to Data Request No. PSCW-KF-1.26:**

New easements will be acquired for wider ROW, if needed, in the segments below:

- Transmission line reconfigurations outside Butler Substation Segment P
- Mill Rd Substation to Germantown Substation reconductor Segment C
- Mill Rd Substation to Granville Substation Segments A, F, I, K and R
- Arcadian Substation to Mill Road Substation Segment D



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Response to Data Request PSC-Watson-1

**Data Request No. PSCW-KF-1.27:**

(Application page 54/115, Section 5.4, Transmission AFR Section 5.4): Provide PSC Impact Tables (1 - General Route Impacts and 2 – Land Cover) that include all proposed facilities, including substations, laydown yards, off-ROW access roads, etc.

**Response to Data Request No. PSCW-KF-1.27:**

See Revised Appendix B Table 1 and Table 2.

The column headers in Table 1 and Table 2 have been altered for the laydown yards and off-ROW access tabs to reflect that no new ROW is being acquired for laydown yards and off-ROW access.

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Response to Data Request PSC-Watson-1

**Data Request No. PSCW-KF-1.28:**

(Application page 58/115, Section 5.5.2, Transmission AFR Section 5.5.2.3): Describe the construction disturbance zone, if different from the ROW, for each phase of construction.

**Response to Data Request No. PSCW-KF-1.28:**

The transmission line “construction disturbance zone” is limited to the ROW except for off-ROW access routes or construction workspaces as depicted in Appendix A, Figure 4. The off-ROW access routes are temporary and were identified by ATC’s construction contractor to limit access through hard-to-reach areas such as open water or marsh/wetland areas, steep slopes, etc., or to leverage existing roads or driveways. Off-ROW access routes are identified as either matted or non-matted in the referenced figure, and do not indicate that actual construction work is taking place in those areas. These are simply proposed access routes for equipment to reach the ROW. The construction workspaces shown outside of the ROW are intended for wire-pulling activities (pulling wire through completed transmission structures via dollies and reels) that cannot be confined to the ROW due to the nature of the activity.

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Response to Data Request PSC-Watson-1

**Data Request No. PSCW-KF-1.29:**

(Application page 58/115, Section 5.5.2, Transmission AFR Section 5.5.2.5): Confirm that no underground line installation would occur. If underground line installation would occur, state the installation method(s).

**Response to Data Request No. PSCW-KF-1.29:**

Underground line installation is not planned for this Project.

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Response to Data Request PSC-Watson-1

**Data Request No. PSCW-KF-1.30:**

(Application page 64/115, Section 5.8, Transmission AFR Section 5.7.2): For each route, provide the dimensions (length and width) and construction method, including if any modifications would be needed to utilize the off-ROW access roads, such as road widening, road fill placement, or tree clearing.

**Response to Data Request No. PSCW-KF-1.30:**

Off-ROW access will generally make use of existing access roads. No road widening or road fill placement has been identified at this time. Construction matting is planned for some off-ROW access routes as indicated in Appendix A, Figure 4. It is anticipated that edge clearing and tree trimming will be required in select locations along some of the existing access routes to provide additional height and width for mat placement and/or construction vehicle access to the minimal extent needed. Clearing and trimming for off-ROW access roads will be performed in compliance with Wisconsin Department of Natural Resources (DNR) Oak Wilt management guidelines.

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Response to Data Request PSC-Watson-1

**Data Request No. PSCW-KF-1.31:**

(Application page 64/115, Section 5.8, Transmission AFR Section 5.7.3): Discuss the reasons for the necessity for off-ROW access roads such as topography, rivers/wetlands, etc. If protection of a natural resource is a reason, specify which resource and discuss how the resource would be protected during construction and operation of the proposed project.

**Response to Data Request No. PSCW-KF-1.31:**

Off-ROW access roads are chosen for linear projects to help facilitate construction while avoiding or minimizing impacts to properties and sensitive resources, and to safely work around difficult terrain. ATC has reviewed the Project area and chosen off-ROW access routes that consider topography, woodlands, waterways, and wetlands. Where available, off-ROW access routes utilize pre-existing farm access lanes, existing gravel roads, and paved surfaces that abut or intersect the proposed corridor. Where no pre-existing access path was identified, off-ROW access roads were chosen to be as direct as possible to the transmission line ROW while accounting for topography, adjacent roadways, forested areas, wetlands, and waterways. Impacts to agricultural fields and natural resources have been minimized to the extent practicable. Where access within sensitive areas is unavoidable, natural resources will be protected through placement of timber construction matting. Sensitive natural resources intersected by off-ROW access will be protected by using timber construction mats. In certain cases, multiple layers may be installed in alternating directions to help with weight displacement on the wetland surface (tailored to the resource's hydrologic condition). No discharge of fill from soil mixing and/or soil rutting is anticipated in wetlands. No access below the ordinary high-water mark of waterways is proposed. No clearing of wooded wetlands for the purpose of off-ROW access is proposed.

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Response to Data Request PSC-Watson-1

**Data Request No. PSCW-KF-1.32:**

(Application page 64/115, Section 5.8, Transmission AFR Section 5.7.4): Provide quantitative land cover information for off-ROW access roads similar to the information provided in PSC Impact Tables.

**Response to Data Request No. PSCW-KF-1.32:**

See Revised Appendix B Table 1 and Table 2.

The column headers in Table 2 have been altered for the off-ROW access to reflect that no new ROW is being acquired for off-ROW access.

The column headers in Table 1 and Table 2 have been altered for the off-ROW access to reflect that no new ROW is being acquired for off-ROW access.

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Response to Data Request PSC-Watson-1

**Data Request No. PSCW-KF-1.33:**

(Application page 64/115, Section 5.9.1, Substation AFR Section 5.1.6): Provide diagrams of the vertical profile of the proposed substation and property.

**Response to Data Request No. PSCW-KF-1.33:**

Please refer to the drawings in Appendix I. Section views showing the vertical profile inside the substation fences will be done during detailed design.

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Response to Data Request PSC-Watson-1

**Data Request No. PSCW-KF-1.34:**

(Application page 66/115, Section 6.1.1, Transmission AFR Section 6.1.1): Provide the use of the forested lands that would be impacted by each route segment.

**Response to Data Request No. PSCW-KF-1.34:**

Forested land use, as determined by desktop aerial imagery review, is summarized by segment in the table, below.

Segment	Use
<b>Common Route</b>	
A	Riparian habitat, upland habitat
C	Timber, riparian habitat, upland habitat
D	Recreation, riparian habitat, upland habitat
E	Riparian habitat, upland habitat
F	Riparian habitat, upland habitat
I	Riparian habitat, upland habitat
K	Recreation, riparian habitat, upland habitat
L	Riparian habitat, upland habitat
M	n/a
P	Upland habitat
R	Upland habitat
<b>Proposed Route</b>	
J	Riparian habitat, upland habitat
N	Recreation, riparian habitat, upland habitat
<b>Alternate Route</b>	
G	Riparian habitat, upland habitat
O	Recreation, riparian habitat, upland habitat
<b>Substations &amp; Mill Rd SS Driveway</b>	
B	Riparian habitat, upland habitat
West Driveway	Riparian habitat, upland habitat
H	n/a
Q	n/a
<b>Temporary Bypass Circuits</b>	
Temp Bypass	Riparian habitat, upland habitat



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**Data Request No. PSCW-KF-1.35:**

(Application page 66/115, Section 6.1.1, Transmission AFR Section 6.1.1, Substation AFR Section 6.1.3): Provide the time of year that clearing would take place in forested lands that would be impacted by each route segment and each substation.

**Response to Data Request No. PSCW-KF-1.35:**

Clearing activities would start in existing easements and on property already owned by ATC shortly after the appropriate regulatory approvals are received in early 2026 and clearing would continue into Q2 of 2027. The timing of clearing work in each segment would be dependent on the timing of regulatory approvals, legal possession of new easements and the construction schedule for each segment. Oak wilt restrictions would be followed between April 1 and July 15.

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Response to Data Request PSC-Watson-1

**Data Request No. PSCW-KF-1.36:**

(Application page 69/115, Section 6.1.2, Substation AFR Section 6.1.2): Identify any substation site land that is enrolled in either Managed Forest Law or Forest Crop Law and discuss how the proposed project would affect their enrollment.

**Response to Data Request No. PSCW-KF-1.36:**

None of the existing substation sites are enrolled in MFL or FCL, the proposed Mill Rd Substation location is owned by ATC and is not enrolled in MFL or FCL.

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Response to Data Request PSC-Watson-1

**Data Request No. PSCW-KF-1.37:**

(Application page 74/115, Section 6.3.1, Transmission AFR Section 6.3.1): Clarify whether further invasive species surveys would be conducted.

**Response to Data Request No. PSCW-KF-1.37:**

Invasive species areas will be observed and mapped once ATC has obtained the necessary access rights to an approved route. Access through or construction within these mapped areas will be done in accordance with NR 40 (Wis. Admin. Code), which pertains to transferring or introducing invasive species.

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Response to Data Request PSC-Watson-1

**Data Request No. PSCW-KF-1.38:**

(Application page 75/115, Section 6.3.2, Transmission AFR Section 6.3.2): State whether oak tree cutting and pruning could be avoided April 1–July 15 to comply with Wisconsin Department of Natural Resources (DNR) Oak Wilt management guidelines.

**Response to Data Request No. PSCW-KF-1.38:**

Oak tree cutting and pruning would be avoided between April 1 and July 15.

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Response to Data Request PSC-Watson-1

**Data Request No. PSCW-KF-1.39:**

(Application page 78/115, Section 6.4.4, Transmission AFR Section 6.4.4): Describe potential impacts from the project to historic property AHI 16801 (Bert Phillips Ballroom/The Schwabenhof) and propose mitigation actions to reduce or eliminate those affects.

**Response to Data Request No. PSCW-KF-1.39:**

As discussed in Appendix F, Exhibit 5, the Proposed Route (Segment J) would have no adverse effects on the Bert Phillips Ballroom/The Schwabenhof, as it runs north and east of the property at a distance of approximately 0.25 miles and is obscured by intervening buildings. If the Alternate Route (Segment G) were chosen, there would be no mitigation that could occur that would eliminate or reduce the visual impact of the 100-to-120-foot transmission line, as the line would be located along the front entrance of the property approximately 145 feet to the south.

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Response to Data Request PSC-Watson-1

**Data Request No. PSCW-KF-1.40:**

(Application page 81/115, Section 6.5, Transmission AFR Section 6.5.2): Provide the conditions of the conservation easement crossed by Segment D, as well as the approvals necessary to construct on the property, and whether the proposed project is consistent with the stated goals of the easement.

**Response to Data Request No. PSCW-KF-1.40:**

Terms and conditions of the conservation easement will not be known until the property title is received. The title search information has not been completed at this time and is in progress.

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Response to Data Request PSC-Watson-1

**Data Request No. PSCW-KF-1.41:**

(Application page 82/115, Section 6.7, Transmission AFR Section 6.7): Identify any contaminated sites and environmental repair and solid waste disposal sites within the project area.

**Response to Data Request No. PSCW-KF-1.41:**

Contaminated sites and environmental repair and solid waste disposal sites identified within the Project segments include 8 BRRTS sites (closed) and 2 landfill/historic waste sites. No open BRRTS cases are identified within the Project segments.

Segment ID	Within Project Area		
	# of BRRTS Cases (Closed)	# of BRRTS Cases (Open)	# of Landfill / Historic Waste Sites
A	0	0	0
B	0	0	0
C	0	0	0
D	0	0	0
E	0	0	0
F	0	0	0
G	0	0	0
H	0	0	0
I	0	0	1
J	0	0	1
K	1	0	0
L	1	0	0
M	0	0	0
N	2	0	0
O	3	0	0
P	1	0	0
Q	0	0	0
R	0	0	0

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Response to Data Request PSC-Watson-1

**Data Request No. PSCW-KF-1.42:**

(Application page 83/115, Section 6.8, Transmission AFR Section 6.8.3): Provide information on how the project will comply with local floodplain ordinances.

**Response to Data Request No. PSCW-KF-1.42:**

Please see Section 1.7.3 of the Application, where ATC indicated that the Project is exempt from complying with local floodplain ordinances. However, ATC will provide Project information to individual local governments, if and when such information is requested.



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Response to Data Request PSC-Watson-1

**Data Request No. PSCW-KF-1.43:**

(Application page 84/115, Section 7.1, Transmission AFR Section 7.1.2): State whether any public information meetings have occurred or are planned to occur. If public information meetings occurred, provide a description of the meetings and who was invited.

**Response to Data Request No. PSCW-KF-1.43:**

No public information meetings were held for the Project, and none are currently planned.

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Response to Data Request PSC-Watson-1

**Data Request No. PSCW-KF-1.44:**

(Application page 84/115, Section 7.2, Transmission AFR Section 7.2): Discuss the concerns raised by the Village of Menomonee officials as referenced in Appendix H Exhibit 5, and reasons for the applicant's responses to those concerns.

**Response to Data Request No. PSCW-KF-1.44:**

Concerns raised by Menomonee Falls officials are outlined in Appendix H, Exhibit 5.

During a brief presentation outlining the various elements of the project, village officials asked questions about two items in particular:

- If there was an ability to underground any portions of the line. ATC indicated the application would include overhead options. Overhead transmission is appropriate in this area for a variety of reasons including constructability, long term maintenance, asset lifespan, and cost.
- Easement access (versus full property acquisition) for the parcel between the substation and Lannon Road to potentially allow for future residential development. Please refer to Appendix F, Exhibit 6 for more detailed information related to ATC's proposal to acquire the parcel for this Project.

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Response to Data Request PSC-Watson-1

**Data Request No. PSCW-KF-1.45:**

(Application page 84/115, Section 7.4, Substation AFR Section 7.4): Provide responses to the Agriculture section regarding impacts for each substation site.

**Response to Data Request No. PSCW-KF-1.45:**

Mill Road Substation -The only anticipated impact to agriculture will be at the Mill Road Substation site. These acres will be removed permanently from all agricultural production and leases will be terminated.

Tamarack Substation - no agricultural impacts

Butler Substation - no agricultural impacts

Granville Substation - no agricultural impacts

Germantown Substation - no agricultural impacts

Arcadian Substation - no agricultural impacts

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Response to Data Request PSC-Watson-1

**Data Request No. PSCW-KF-1.46:**

(Application page 87/115, Section 7.4.7, Transmission AFR Section 7.4.7.3): Discuss any plans to offer Neutral-to-Earth testing to landowners of the nearby agricultural operations identified.

**Response to Data Request No. PSCW-KF-1.46:**

ATC performed a confined animal feeding operation (CAFO) study and determined no operations are present. Therefore, no further NEV activities are required.

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Response to Data Request PSC-Watson-1

**Data Request No. PSCW-KF-1.47:**

(Application page 88/115, Section 7.6, Substation AFR Section 7.6.1): Discuss the potential aesthetic issues associated with proposed substation construction as it relates to the surrounding land uses.

**Response to Data Request No. PSCW-KF-1.47:**

The Mill Road substation will be located on ATC owned property approximately 400 feet from the nearest residence, 260 feet from the rail line, and adjacent to the transmission line ROW. The proximity to the transmission line ROW and rail ROW and relative distance from the residences, as well as wooded land in between, should limit the aesthetic impacts of the substation.

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Response to Data Request PSC-Watson-1

**Data Request No. PSCW-KF-1.48:**

(Application page 88/115, Section 7.6, Substation AFR Section 7.6.2): Describe the plans for landscaping or other measures used to mitigate the potential aesthetic impacts imposed by the proposed Mill Road Substation and other substation expansions.

**Response to Data Request No. PSCW-KF-1.48:**

The newly graded area around the Mill Road Substation as well as soil stockpiles on the property will be restored with an appropriate ATC seed mix listed in Appendix F, Exhibit 10. There will be a tiered retaining wall on the southeast side of the substation that will likewise be seeded. Trees intended for screening the view of the substation from the surrounding properties would be incompatible with the transmission lines connecting to the substation and are not proposed.

Other substation sites will have minimal grading and expansion that are not anticipated to have any aesthetic impacts.

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Response to Data Request PSC-Watson-1

**Data Request No. PSCW-KF-1.49:**

(Application page 89/115, Section 7.7, Transmission AFR Section 7.7.2): State whether any communications have occurred with owners of parks impacted by the project.

**Response to Data Request No. PSCW-KF-1.49:**

As noted in section 7.1 of the Application, ATC sent project mailers to landowners within 300 feet of the proposed centerlines and to landowners on either side of highways along the proposed routes on October 1, 2024. This included the municipal and county landowners of the parks noted on Table 7.7-1. Mailers were also sent to elected officials and select staff members of the counties and municipalities.

Milwaukee County Parks acknowledged receipt of the mailer with the email provided in the Application (Appendix E, Exhibit 3).

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Response to Data Request PSC-Watson-1

**Data Request No. PSCW-KF-1.50:**

(Application page 92/115, Section 7.8.3, Transmission AFR Section 7.8.3): Describe any potential for impact to aircraft safety and intrusion into navigable airspace (runway approaches).

**Response to Data Request No. PSCW-KF-1.50:**

An aeronautical impact statement was prepared for this Project (see Appendix H, Exhibit 9) to identify potential obstruction standard limitations. This report identified five (5) structures that appear to exceed the maximum allowable heights for the Lawrence J. Timmerman Runway. Mitigation strategies will be considered during the design stage including but not limited to applying for variances and lowering structures and lighting. Final requirements will be confirmed through filing the design height and locations with the FAA.



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Response to Data Request PSC-Watson-1

**Data Request No. PSCW-KF-1.51:**

(Application page 92/115, Section 7.8.4, Transmission AFR Section 7.8.4): Describe construction limitations or permit issues related to airports that could result from any proposed structures. Discuss how construction limitations or permit issues related to airports would be addressed for any structures that exceed obstruction standards or zoning limits when structure locations and heights are finalized.

**Response to Data Request No. PSCW-KF-1.51:**

ATC will follow the FAA process of filing structures and construction equipment heights with the FAA prior to construction. Upon receipt of the FAA requirements, a plan will be developed to address situations that exceed the obstruction standards. This plan can include but is not limited to marking and lighting.

Additionally, an aeronautical impact statement was prepared for this Project (see Appendix H, Exhibit 9) to identify potential obstruction standard limitations. This will be used to mitigate and plan for the FAA requirements.

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Response to Data Request PSC-Watson-1

**Data Request No. PSCW-KF-1.52:**

(Application page 92/115, Section 7.8.5, Transmission AFR Section 7.8.5): State whether consultation other than use of the Federal Aviation Administration (FAA) Notice Criteria Tool has occurred with the WisDOT Bureau of Aeronautics and the FAA. If so, provide documentation.

**Response to Data Request No. PSCW-KF-1.52:**

At this stage, direct consultation with WisDOT Bureau of Aeronautics and the FAA has not occurred. An aeronautical impact statement was prepared for this Project (see Appendix H, Exhibit 9) to identify potential obstruction standard limitations. This will be used to mitigate and plan for the FAA requirements.

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Response to Data Request PSC-Watson-1

**Data Request No. PSCW-GR-1.53:**

Provide an updated wetland delineation report with the following information:

- Clarify if Section 1.2 was used to inform the wetland field delineation and/or if it was used as a method to determine the presence of wetland as well as to determine wetland boundaries for the desktop non-conservative method.
- In areas with mapped wetland indicators and/or mapped Wisconsin Wetland Inventory (WWI) wetlands and/or additional areas identified during the offsite review, provide site-specific details and supporting documentation demonstrating why these areas were determined to be upland if not field delineated.
- Clarify if the conservative desktop review method discussed in Section 1.2.1 was limited to WWI and Wisconsin Department of Natural Resources (DNR) Wetlands Indicators layer or if it also included a review of other desktop resources such as lidar and air photo review.
- Provide supporting documentation to demonstrate how areas were determined to be upland and how wetland boundaries were determined for the field verification method and the desktop determined (non-conservative) method.
- Section 2.5.2.1: Provide documentation on how areas were determined to be upland and how boundaries were determined.
- Section 2.5.2.2: Clarify if this method was limited to off-ROW access areas.
- Explain why some areas with no access were evaluated via conservative desktop determination while other areas were reviewed with a desktop determination or field verification.
- Provide a single stand-alone figure that identifies the project review area (polygon), wetland evaluation method (polygon), and wetland boundaries (polygon).
- Update the wetland delineation summary table (appendix F) to correspond with the evaluation methods identified in Section 1 of the report.

**Response to Data Request No. PSCW-GR-1.53:**

An updated wetland report and figures have been provided as an attachment (Attachment PSCW-GR-1.53) to this data request.

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Response to Data Request PSC-Watson-1

**Data Request No. PSCW-GR-1.54:**

Update the corresponding comment cells of DNR Table 1 to indicate what project components are included in the permanent wetland fill calculation and how the square footage of impact was determined.

**Response to Data Request No. PSCW-GR-1.54:**

WDNR Table 1 (Revised Appendix F, Table 1) has been updated with comments indicating the Project component associated with each permanent wetland fill calculation. Permanent fill associated with each structure is based on a conservative estimated foundation diameter of 15 feet. Therefore, the area ( $A$ ) of permanent fill associated with each structure is approximately 176.7 sq. ft ( $A = (\pi)(7.5^2)$ ).

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Response to Data Request PSC-Watson-1

**Data Request No. PSCW-GR-1.55:**

Provide an updated Practical Alternative Analysis (PAA) to include the wetland impact associated with the proposed Mill Road Substation footprint as well as other practicable alternatives to avoid and minimize wetland fill such as different parcels, driveway width and side slopes, substation size and orientation, etc.

**Response to Data Request No. PSCW-GR-1.55:**

An updated PAA (Revised Appendix F, Exhibit 6) has been uploaded to include the wetland impact associated with the proposed Mill Road Substation footprint as well as other practicable alternatives to avoid and minimize wetland fill such as different parcels, driveway width and side slopes, substation size and orientation, etc.

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Response to Data Request PSC-Watson-1

**Data Request No. PSCW-GR-1.56:**

Provide details on how natural stream migration was considered when siting structure placement. Indicate if there is a minimum setback from waterway banks that would be used when siting structures to account for future bank erosion and avoid structure exposure.

**Response to Data Request No. PSCW-GR-1.56:**

There is no standard minimum setback utilized when siting structures; however, the spotting of structures is an iterative process as design progresses. Therefore, preliminary design will be refined to ensure that final structure location considers waterway locations while accounting for bank erosion.

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Response to Data Request PSC-Watson-1

**Data Request No. PSCW-GR-1.57:**

Verify AR-9140 is a feasible route to access the wetland area north of 190.

**Response to Data Request No. PSCW-GR-1.57:**

Access is feasible by using multiple layers of construction mats.

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Response to Data Request PSC-Watson-1

**Data Request No. PSCW-GR-1.58:**

Verify staging and/or laydown areas are not needed for access or construction in the wetland area north of 190.

**Response to Data Request No. PSCW-GR-1.58:**

Staging and/or laydown areas are not needed for access or construction in the wetland area north of 190.



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Response to Data Request PSC-Watson-1

**Data Request No. PSCW-GR-1.59:**

Provide a discussion of the proposed construction techniques in the wetland complex north of 190 that considers the wet saturated conditions of the area.

**Response to Data Request No. PSCW-GR-1.59:**

Multiple layers of timber mats will be needed for access to the structures. Mats will be placed in layers of alternating direction to help with weight displacement on the wetland surface. Permanent pipe will be used for the new structure 9140 foundation. The top of casing of the new foundation will be higher than the water level in the wetland. This will help minimize impacts to the wetland during installation of the new structure. The legs of the existing tower will be cut off at the wetland surface when it is removed. This will also help minimize impacts to the wetland during structure demolition.

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Response to Data Request PSC-Watson-1

**Data Request No. PSCW-GR-1.60:**

Verify all mapped and field identified waterways were identified in the project area, were provided a unique feature identification (ID), and were included in DNR Table 1 (if applicable) and Table 2. For example, there is a DNR mapped waterway within the proposed ROW in proximity to structure W-324 that does not appear to be identified as a waterway, provided a unique feature ID, or included in the DNR tables.

**Response to Data Request No. PSCW-GR-1.60:**

DNR Table 1 and 2 (Revised Appendix F, Tables 1 and 2) have been updated and are included as an attachment to this data request response.

American Transmission Company  
Mill Rd-Granville Project  
Docket No. 137-CE-212

Response to Data Request PSC-Watson-1

**Data Request No. PSCW-GR-1.61:**

Submit a navigability determination request package for waterway ST-35 and ST-36 as it is located in the footprint of the proposed Mill Road Substation.

**Response to Data Request No. PSCW-GR-1.61:**

A navigability determination request package for ST-35 and ST-36 is included as an attachment to this data request response (Attachment PSCW-GR-1.61).