Public Service Commission of Wisconsin Surrebuttal Testimony of Kyle Feltes Division of Digital Access, Consumer and Environmental Affairs

American Transmission Company LLC Docket 137-CE-212

May 27, 2025

1	Q.	Did you file direct testimony in this proceeding?
2	A.	Yes.
3	Q.	What is the purpose of your surrebuttal testimony?
4	А.	My surrebuttal testimony will offer updates to my direct testimony based on data request
5		responses and will also respond to the following rebuttal testimony and exhibits:
6		• Rebuttal-ATC-Hoffman
7		• ExMRP-Jackson-2r2
8		• ExWP-G.Weymier-1r2
9	Q.	Do you have any exhibits to offer in support of your surrebuttal testimony?
10	А.	No.
11	Q.	ATC witness Stephan Hoffmann states at Rebuttal-ATC-Hoffmann-5-6 that the
12		adjustment to Segment E suggested at Direct-PSC-Feltes-8-10 would be feasible,
13		and that the revised alignment would need to be compatible with other potential
14		route adjustments requested by property owners to the east. What is your
15		response?
16	A.	Marcy Road Property (MRP) witness Christopher A. Jackson and Weymier Property
17		(WP) witness Gregg Weymier each have provided suggestions for alternate routes that
18		would affect Segment E. The maps provided by MRP and WP which illustrate their
19		respective suggestions for alternate routes for Segment E largely affect the Marcy Road

Properties 1 and 2, the Dominski Revocable Living Trust property (not a party to this 1 docket), and Gregg and Jennifer Weymiers' property. (Ex.-MRP-Jackson-2v2, Ex.-WP-2 G.Weymier-1v2.) The shift in Segment E discussed in my direct testimony at Direct-3 PSC-Feltes-8-10 and in Ex.-PSC-EA, which would move the proposed right-of-way 4 (ROW) approximately 50 feet to the north to minimize impacts to the Fleisner Living 5 Trust property, seems to be compatible with the alternate routes posed by the parties 6 mentioned. There is currently no graphical representation of this shift. If the 7 Commission were to find the northern shift of Segment E to avoid the Fleisner property 8 9 reasonable to require as part of the project approval, as well as one of the alternate routes posed by MRP or WP, slight modifications may be necessary to the angle of the approach 10 where the MRP and WP alternate routes turn northwest to exit the northwest corner of the 11 Marcy Road Property 2 parcel. The MRP or WP alternate options could then travel 12 further north to meet the centerline as proposed in the shift I had discussed. If the MRP 13 14 or WP alternate options would not be altered in such a way, the northeast corner of the Fleisner parcel may be within the new transmission ROW, resulting in tree clearing that 15 was requested to be avoided by the landowner. 16 17 The alternative routes as suggested by the MRP and WP parties do not currently

have incremental differences in environmental impacts attributed to the changes in the
route design reflected in the record. These differences would need to be provided by the
applicant for the total impacts imposed by the project to be known, if one of the
alternative route options are selected. The impact differences associated with the
potential shift in Segment E that has been discussed in my direct testimony at DirectPSC-Feltes-8-10 and in Ex.-PSC-EA would likely be inaccurate if combined with one of

- 1 the alternate routes proposed by MRP or WP, as each would come with its own
- 2 differences in impacts, and both would affect the alternate that I had proposed.
- 3 Modifications to combine these options as previously discussed would similarly differ in
- 4 total impacts compared to those associated with each individual option if selected alone.

5 Q. Does this conclude your surrebuttal testimony?

6 A. Yes.

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