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Public Service Commission of Wisconsin
RECEIVED: 7/17/2025 2:38:30 PM

July 17, 2025

Ms. Kate Christensen
Division Administrator
Division of Energy Regulation and Analysis
Public Service Commission of Wisconsin
4822 Madison Yards Way
Madison, Wisconsin

**RE: Wisconsin Power and Light Company
MISO Expedited Resource Addition Study Project Requests
Docket No. 5-EI-2025**

Dear Ms. Christensen:

Wisconsin Power and Light Company ("WPL") is preparing to submit generation interconnection requests into the Midcontinent Independent System Operator ("MISO") Expedited Resource Addition Study ("ERAS") process. Accordingly, WPL is seeking the Public Service Commission of Wisconsin ("PSCW") Relevant Electric Retail Regulatory Authority ("RERRA") verification for three interconnection projects ("Projects") included in this request. The ERAS process is intended to enable the interconnection of generation that is needed for reliability and as such, WPL is currently advancing these projects through MISO's normal queue. However, WPL believes ERAS is needed to provide more certainty on the timing and interconnection costs for these projects, which are needed to serve WPL's customers. The Projects include the following requests which meet MISO's ERAS process criteria:

- A 153 MW wind resource with a point of interconnection located at Freeborn 161 kV substation ("Bent Tree North"). Provided as Attachment 1 is the section of the Attachment X – Appendix 1 interconnection request form to be included with the ERAS submission to MISO that provides the interconnection service requested, location of the project and requested in-service date.
- A 150 MW enhancement to existing combustion turbines with a point of interconnection located at the Neevin 138 kV substation ("Neenah Upgrades"). Provided as Attachment 2 is the section of the Attachment X – Appendix 1 interconnection request for 2m to be included with the ERAS submission to MISO that provides the interconnection service requested, location of the project and requested in-service date.
- A 150 MW enhancement to existing combustion turbines with a point of interconnection located at the Sheboygan Falls 345 kV substation (the "Sheboygan Falls Upgrades"). Provided as Attachment 3 is the section of the Attachment X – Appendix 1 interconnection request form to be included with the

ERAS submission to MISO that provides the interconnection service requested, location of the project and requested in-service date.

In order for WPL to submit an interconnection application into the ERAS process, the interconnection request must be accompanied by a written verification from the RERRA (or its documented representative) in the state where the load to be served by the generating facility is located.¹ This requirement by MISO incorporates the role of states and RERRAs related to resource adequacy. The RERRA must verify that:

- 1) the new, incremental load addition claimed by the Interconnection Customer is valid and not otherwise included in a resource plan or other process under the RERRA's purview, and/or
- 2) the generating facility proposed by the Interconnection Customer will address a resource adequacy deficiency as determined by the RERRA, State, Load Serving Entity, or Interconnection Customer.²

Regarding item 2, this determination can be supported in multiple ways which include the commencement of a state proceeding or the review of a RERRA, LSE, or other state resource plan or document, which may include, but is not limited to: integrated resource plans, procurement plans, or other plan or study types.³

WPL has met the MISO tariff requirements to support the RERRA verification for each of the Projects through the commencement of a state proceeding. More specifically:

- On April 18, 2025, WPL filed an application for a Certificate of Authority in PSCW docket 6680-CE-189 to construct the Bent Tree North wind farm.
- On June 2, 2023, WPL filed an application for a Certificate of Authority in PSCW docket 6680-CE-185 to construct the Neenah Upgrades.
- On June 2, 2023, WPL filed an application for a Certificate of Authority in PSCW docket 6680-CE-186 to construct the Sheboygan Falls Upgrades.

For a project submitted into the ERAS process, the requested interconnection service cannot exceed 150% of the identified megawatt ("MW") need. The total MWs identified from the filings above represents 453 MWs. The interconnection service requested for the Project is 453 MWs of Network Resource Integration Service. As a result, the total interconnection service requested meets the ERAS process requirements. Also, the Neenah Upgrades and Sheboygan Falls Upgrades are located in the same Local Resource Zone ("LRZ") as the load WPL serves which meets the requirements of the ERAS process. The Bent Tree North project is located in a different LRZ (Zone 3) than the load of WPL (Zone 2). However, the MISO ERAS process allows an ERAS application to be in a different LRZ if the resource was included in a resource filing or

¹ MISO, Proposed Tariff, Attachment X (Generator Interconnection Procedures (GIP)) (175.0.0) § 3.9.1.1.

² *Id.* § 3.9.1.1.i-ii.

³ *Id.* § 3.9.1.1.ii.

other submission to the RERRA that is providing the verification.⁴ As the Bent Tree North application has been submitted to the PSCW in 6680-CE-189, the application meets the requirements of the MISO ERAS process.

WPL hereby requests the PSCW provide a written verification by August 4, 2025 to accompany the interconnection requests for the Projects to allow the interconnection applications to enter the ERAS process within the August 6-11, 2025 submission window. Provided as Attachment 4 is a sample verification letter which could be used by the PSCW in responding to this request.

Respectfully,

/s/ Rebecca Cameron Valcq

Rebecca Cameron Valcq

Assistant Vice President, Regulatory Affairs and Data Center Services

Alliant Energy Corporation

BeckyValcq@alliantenergy.com

Attachments:

Attachment 1: Bent Tree North Attachment X – Appendix 1

Attachment 2: Neenah Upgrades Attachment X – Appendix 1

Attachment 3: Sheboygan Falls Upgrades Attachment X – Appendix 1

Attachment 4: Sample REERA verification letter

⁴ *Id.* § 3.3.3. See also MISO transmittal letter at p. 32 in FERC Docket No. ER25-2454-000.

Attachment 1: Bent Tree North Attachment X – Appendix 1

**APPENDIX 1 TO GIP
INTERCONNECTION REQUEST**

1. [The undersigned Interconnection Customer submits this request to interconnect its Generating Facility, located in Freeborn County, [MN State], with the Transmission System pursuant to the Tariff.] or;

[The undersigned MHVDC Connection Customer submits this request for Injection Rights for its MHVDC Transmission Line, located in _____ County, [____ State], with the Transmission System pursuant to a Tariff.];

2. This Interconnection Request is for (check one):

- ☒ _____ Proposed new Generating Facility
- _____ Increase in the generating capacity or a Material Modification of an Existing Generating Facility
- _____ Replacement of Existing Generating Facility with no increase in capacity
- _____ Interconnection Request made in connection with a Generating Facility proposed for inclusion in a resource solicitation process
- _____ Network Resource Interconnection Service for a Generating Facility in Commercial Operation or with an executed GIA
- _____ Generating Facility requesting Surplus Interconnection Service
- _____ Fast Track Process for Small Generating Facility
- _____ Injection Rights associated with a new MHVDC Transmission Line.

3. The type of interconnection service requested is (check one as appropriate):

- _____ Energy Resource Interconnection Service only
- ☒ _____ Network Resource Interconnection Service (includes Energy Resource Interconnection Service)
- _____ Network Resource Interconnection Service only for an Existing Generating Facility

- _____ Network Resource Interconnection Service in connection with a resource solicitation process
- _____ Surplus Interconnection Service
- _____ External Network Resource Interconnection Service (E-NRIS) for projects connecting to a Distribution System or non-MISO transmission system;

4. Interconnection Customer provides the following definitive information:

- a. Specific address or location (use closest street or intersection if no address is available) for the proposed new Generating Facility site or, in the case of an Existing Generating Facility, the name and specific location of the Existing Generating Facility (provide a site map and GPS coordinates);

Address: 31072 State 13
 City: Hartland State: MN Zip Code: 56042
 GPS Coordinates: 43.804669 N -93.477236 W

- b. The following specific information related to the Interconnection Service Requested:

Required Information Related to Interconnection Request			Additional Information/Documentation
Installed Generating Facility Capacity (Maximum Gross Output)	Summer (MW/MVAR): 148.5 / 84.16	Winter (MW/MVAR): 148.5 / 84.16	
Existing Interconnection Service, if any	ERIS: (MW/MVAR): /	NRIS: (MW/MVAR): /	Provide GIA, and SIS report for Existing Generating Facility

New Interconnection Service or Increase in Existing Interconnection Service Requested (Maximum Injection at POI)	ERIS (New) (MW/MVAR): <u>146 / 84.16</u> or ERIS (Increase) (MW/MVAR): ____/____	NRIS (New) (MW/MVAR): <u>146 / 84.16</u> or NRIS (Increase) (MW/MVAR): ____/____	Requested total ERIS must be less than or equal to Installed Generating Facility Capacity. Requested total NRIS must be less than or equal to total requested ERIS.
Station Service Load, if any	Summer (MW/MVAR): ____/____	Winter (MW/MVAR): ____/____	
Surplus Interconnection Service Requested (No increase in Existing Interconnection Service)	Surplus Interconnection Service (MW/MVAR): ____/____		SIS report for existing unit and written statement pursuant to Section 6 of this Interconnection Request
“NRIS only”/ External NRIS	NRIS Only (MW/MVAR): ____/____	External-NRIS (MW/MVAR): ____/____	CP Node: _____ Point of Interconnection: _____ Bus Number in Power Flow Models: _____

- c. A description of the equipment configuration (i.e. Number of generators/inverters and number of Intermediate Step-up transformers, is this phase 2 of an existing project, etc.) for the entire Generating Facility:
33 Vestas v136 turbines and pad mount transformers behind a single 161/34.5/13.8 kV transformer
- d. Generating Facility Commercial Operation Date 12/31/2028,
Synchronization Date 9/30/2028, and required Interconnection Facilities
In-Service Date 6/30/2028 by day, month, and year;

Attachment 2: Neenah Upgrades Attachment X – Appendix 1

APPENDIX 1 TO GIP
INTERCONNECTION REQUEST

1. [The undersigned Interconnection Customer submits this request to interconnect its Generating Facility, located in Winnebago, , County, [WI State], with the Transmission System pursuant to the Tariff.] or;
[The undersigned MHVDC Connection Customer submits this request for Injection Rights for its MHVDC Transmission Line, located in Winnebago, , County, [WI State], with the Transmission System pursuant to a Tariff.]

2. This Interconnection Request is for (check one):

- ☐ Proposed new Generating Facility
- ☒ Increase in the generating capacity or a Material Modification of an Existing Generating Facility
- ☐ Replacement of Existing Generating Facility with no increase in capacity
- ☐ Interconnection Request made in connection with a Generating Facility proposed for inclusion in a resource solicitation process
- ☐ Network Resource Interconnection Service for a Generating Facility in Commercial Operation or with an executed GIA
- ☐ Generating Facility requesting Surplus Interconnection Service
- ☐ Fast Track Process for Small Generating Facility
- ☐ Injection Rights associated with a new MHVDC Transmission Line.

3. The type of interconnection service requested is (check one as appropriate):

- ☐ Energy Resource Interconnection Service only
- ☒ Network Resource Interconnection Service (includes Energy Resource Interconnection Service)

- ☐ Network Resource Interconnection Service only for an Existing Generating Facility
- ☐ Network Resource Interconnection Service in connection with a resource solicitation process
- ☐ Surplus Interconnection Service
- ☐ External Network Resource Interconnection Service (E-NRIS) for projects connecting to a Distribution System or non-MISO transmission system

4. Interconnection Customer provides the following definitive information:

- a. Specific address or location (use closest street or intersection if no address is available) for the proposed new Generating Facility site or, in the case of an Existing Generating Facility, the name and specific location of the Existing Generating Facility (provide a site map and GPS coordinates);

Address: 200 County Rd CB

City: Neenah State: WI Zip: 54956

GPS Coordinates: 44.19364 N -88.50644 W

- b. The following specific information related to the Interconnection Service Requested:

Required Information Related to Interconnection Request			Additional Information/Documentation
Installed Generating Facility Capacity (Maximum Gross Output)	Summer (MW/MVAR): <u>410/221.3</u>	Winter (MW/MVAR): <u>450/242.9</u>	
Existing Interconnection Service, if any	ERIS (MW/MVAR): <u>300/161.9</u>	NRIS (MW/MVAR): <u>300/161.9</u>	Provide GIA, and SIS report for Existing Generating Facility
New Interconnection Service or Increase in Existing Interconnection Service Requested (Maximum Injection at POI)	ERIS (New) (MW/MVAR): <u>∅</u> or ERIS (Increase) (MW/MVAR): <u>150/∅</u> <u>81.0</u>	NRIS (New) (MW/MVAR): <u>∅</u> or NRIS (Increase) (MW/MVAR): <u>150/81.0</u>	Requested total ERIS must be less than or equal to Installed Generating Facility Capacity. Requested total NRIS must be less than or equal to total requested ERIS.
Station	Summer (MW/MVAR): <u>3.7/2.0</u>	Winter (MW/MVAR): <u>3.7/2.0</u>	

Service Load, if any			
Surplus Interconnection Service Requested (No increase in Existing Interconnection Service)	Surplus Interconnection Service (MW/MVAR): /		SIS report for existing unit and written statement pursuant to Section 6 of this Interconnection Request
“NRIS only”/ External NRIS	NRIS Only (MW/MVAR): /	External-NRIS (MW/MVAR): /	CP Node: Point of Interconnection: Bus Number in Power Flow Models:

- c. A description of the equipment configuration (i.e. Number of generators/inverters and number of Intermediate Step-up transformers, is this phase 2 of an existing project, etc.) for the entire Generating Facility:
The proposed project considers upgrades to two (2) existing General Electric 7F combustion turbines in simple cycle configuration. Each combustion turbine output will increase from nominally 150 MW to 225 MW as a result of the upgrade, for a total facility capability of 450 MW. Each combustion turbine is connected via an 18/138 kV generator step-up transformer to the existing Neevin substation.,
- d. Generating Facility Commercial Operation Date 12/31/2025, Synchronization Date 10/01/2025, and required Interconnection Facilities In-Service Date 09/01/2025 by day, month, and year;

Attachment 3: Sheboygan Falls Upgrades Attachment X – Appendix 1

APPENDIX 1 TO GIP
INTERCONNECTION REQUEST

1. [The undersigned Interconnection Customer submits this request to interconnect its Generating Facility, located in Sheboygan, , County, [WI State], with the Transmission System pursuant to the Tariff.] or;
[The undersigned MHVDC Connection Customer submits this request for Injection Rights for its MHVDC Transmission Line, located in Sheboygan, , County, [WI State], with the Transmission System pursuant to a Tariff.]

2. This Interconnection Request is for (check one):

- ☐ Proposed new Generating Facility
- ☒ Increase in the generating capacity or a Material Modification of an Existing Generating Facility
- ☐ Replacement of Existing Generating Facility with no increase in capacity
- ☐ Interconnection Request made in connection with a Generating Facility proposed for inclusion in a resource solicitation process
- ☐ Network Resource Interconnection Service for a Generating Facility in Commercial Operation or with an executed GIA
- ☐ Generating Facility requesting Surplus Interconnection Service
- ☐ Fast Track Process for Small Generating Facility
- ☐ Injection Rights associated with a new MHVDC Transmission Line.

3. The type of interconnection service requested is (check one as appropriate):

- ☐ Energy Resource Interconnection Service only
- ☒ Network Resource Interconnection Service (includes Energy Resource Interconnection Service)

- ☐ Network Resource Interconnection Service only for an Existing Generating Facility
- ☐ Network Resource Interconnection Service in connection with a resource solicitation process
- ☐ Surplus Interconnection Service
- ☐ External Network Resource Interconnection Service (E-NRIS) for projects connecting to a Distribution System or non-MISO transmission system

4. Interconnection Customer provides the following definitive information:

- a. Specific address or location (use closest street or intersection if no address is available) for the proposed new Generating Facility site or, in the case of an Existing Generating Facility, the name and specific location of the Existing Generating Facility (provide a site map and GPS coordinates);

Address: N5787 Bridgewood Road

City: Plymouth State: WI Zip: 53073

GPS Coordinates: 43.75186 N -87.87813 W

- b. The following specific information related to the Interconnection Service Requested:

Required Information Related to Interconnection Request			Additional Information/Documentation
Installed Generating Facility Capacity (Maximum Gross Output)	Summer (MW/MVAR): <u>410/221.3</u>	Winter (MW/MVAR): <u>450/242.9</u>	
Existing Interconnection Service, if any	ERIS (MW/MVAR): <u>300/161.9</u>	NRIS (MW/MVAR): <u>300/161.9</u>	Provide GIA, and SIS report for Existing Generating Facility
New Interconnection Service or Increase in Existing Interconnection Service Requested (Maximum Injection at POI)	ERIS (New) (MW/MVAR): <u>∅</u> or ERIS (Increase) (MW/MVAR): <u>150/∅</u> <u>81.0</u>	NRIS (New) (MW/MVAR): <u>∅</u> or NRIS (Increase) (MW/MVAR): <u>150/81.0</u>	Requested total ERIS must be less than or equal to Installed Generating Facility Capacity. Requested total NRIS must be less than or equal to total requested ERIS.
Station	Summer (MW/MVAR): <u>3.5/1.9</u>	Winter (MW/MVAR): <u>3.5/1.9</u>	

Service Load, if any			
Surplus Interconnection Service Requested (No increase in Existing Interconnection Service)	Surplus Interconnection Service (MW/MVAR): /		SIS report for existing unit and written statement pursuant to Section 6 of this Interconnection Request
“NRIS only”/ External NRIS	NRIS Only (MW/MVAR): /	External-NRIS (MW/MVAR): /	CP Node: Point of Interconnection: Bus Number in Power Flow Models:

- c. A description of the equipment configuration (i.e. Number of generators/inverters and number of Intermediate Step-up transformers, is this phase 2 of an existing project, etc.) for the entire Generating Facility:
The proposed project considers upgrades to two (2) existing General Electric 7F combustion turbines in simple cycle configuration. Each combustion turbine output will increase from nominally 150 MW to 225 MW as a result of the upgrade, for a total facility capability of 450 MW. Each combustion turbine is connected via an 18/345 kV generator step-up transformer to the existing Sheboygan Falls substation.,
- d. Generating Facility Commercial Operation Date 12/31/2025, Synchronization Date 10/01/2025, and required Interconnection Facilities In-Service Date 09/01/2025 by day, month, and year;

Attachment 4: Sample REERA verification letter

Sample RERRA Verification Form

Instructions: This form may be completed by a representative of the applicable relevant electric retail regulatory authority (“RERRA”) where the load to be served by the Generating Facility is located and returned to the Interconnection Customer for submission to MISO. The use of this form is not required, and the representative of the applicable RERRA may submit other forms of written verification to MISO.

1. I, [Name of RERRA Official], am the [Title] of the [RERRA].
2. I am completing this informational form on behalf of the [RERRA] and I am confirming that the generation facility identified in the Interconnection Request application should be considered for the ERAS process in order to meet a resource adequacy and/or reliability need that the Load Serving Entity or Interconnection Customer has claimed. I am verifying to MISO that the proposed Interconnection Request project was included in an applicable state or RERRA process identifying its association with resource adequacy and/or reliability purposes, which may be triggered by, in whole or in part, but is not limited to:
 - ☐ A state energy forecast, or other forward-looking forecast;
 - ☐ The commencement of a state proceeding;
[Insert Brief Description of Proceeding]
 - ☐ Review of a RERRA, LSE, or other state resource plan or document, which may include, but is not limited to: integrated resource plans, procurement plans, or other plan or study types;
[Attach or Reference IRP Document]
 - ☐ Response to a Request for Proposals (RFP); or
[Attach RFP Information or Insert Brief Description]
 - ☐ Other process, or delegation of authority, as determined by the RERRA or RERRA regulations (including in retail choice states).
[Insert Brief Description]
3. Given the facts above in paragraph 2, the [RERRA] acknowledges that the [Project Applicant’s Resource Name] is a candidate for study under MISO’s Expedited Resource Addition Study process.
4. At this time, the [RERRA] [has/has not] completed its formal regulatory reviews of [Project Applicant’s Resource Name].
 - ☐ Not Applicable in [State].

5. I understand that the generation facility must meet certain requirements specified in MISO's Tariff to qualify for the ERAS process.
6. Nothing within this informational form constitutes a finding that the resource has been formally approved under any of the [RERRA]'s required procedures. Nothing within this form constitutes an indication, approval, or certification by the [RERRA] that the [Project Applicant's Resource Name] is prudent, or that construction or purchase of that generation is or should be authorized at the retail level. That determination is reserved by the RERRA, and any retail RERRA process required under retail law and regulations is not waived. This form shall not be used as evidence by any party to support or justify a request for siting, a Certificate of Public Need or Necessity, cost recovery or any other required RERRA retail jurisdictional determination.

I may be contacted for further information at the following address:

[Name of RERRA Official]
[RERRA]
[Title]
[Address]
[Phone Number]
[Email]

Date: _____ Signature: _____