

June 8, 2020

To: Zoning and Land Regulation (ZLR) Committee Members, Todd Violante, Roger Lane

From: Roxann Engelstad, Prof. Emeritus, 3045 Clear View Rd, Town of Christiana

RE: Proposed Koshkonong Solar Plant in Christiana Township, Dane County

I recently learned that the ZLR Committee allowed an informational presentation by Invenergy regarding the proposed Koshkonong solar plant in the Town of Christiana. This presentation was given as a "Report to the Committee" held during the April 13th meeting. As you heard from Mr. Litchfield, Invenergy has leased 5,800 acres of prime farmland in the Towns of Christiana and Deerfield to develop a utility-scale solar plant, and they proposed to locate this facility right up to the western border of the Village of Cambridge.

It should be noted that Christiana Township is already home to two 345-kV lines, two 138-kV lines, a 460-MW gas-fired power plant, and a substation so large it was recently fortified with concrete walls and security gates. Now Invenergy is proposing to initially develop a 465 MW solar facility in the same area, with the intention of adding another 110 MW in the near future. And, of course, they would like to construct a second substation to handle the additional power.

It should also be pointed out that Invenergy has proposed to install a Battery Energy Storage System (referred to as a BESS) on 25 acres of the project area that lies within 1,600 ft. of the border of Cambridge. This lithium-ion battery storage unit is listed at 165 MW / 660 MWh, which is an extremely large system with a unique set of hazards (including the possibility of releasing toxic gases that could result in an explosion and/or a very difficult-to-extinguish fire).

In essence, the proposed facility is just TOO LARGE and TOO CLOSE to Cambridge. Our township is already overloaded with utility infrastructure, particularly for a small rural community noted for some of the most productive farmland in the state. And with the proposed location of the solar plant, the extraterritorial jurisdiction (ETJ) zone for Cambridge will essentially be eliminated (for up to 50 years). The future of Cambridge will depend on the ability to develop and grow – but they will need their ETJ zone to do so.

For reasons such as this, both the Town of Christiana and the Village of Cambridge are opposing this facility and have not entered into any agreements with Invenergy. In fact, both the Town and the Village have filed for Intervenor status with the PSC (see the attached PSC dockets).

At some point Invenergy will want the County to sign a development agreement. The agreement appears innocuous but will be touted by Invenergy to the PSC as approval of the project by the County. I would urge the County to hold a full public hearing before any decisions are made. I would also urge the County, from a land planning perspective, to recommend to the PSC that the project be reduced in size and relocated as well.

Thank you for your consideration.

**BEFORE THE PUBLIC SERVICE COMMISSION OF WISCONSIN**

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In re the Application for a Certificate of Public Convenience and Necessity of Koshkonong Solar Energy Center LLC to Construct a Solar Electric Generation Facility in the Town of Christiana and the Town of Deerfield, Dane County, Wisconsin

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**NOTICE OF INTERVENTION**

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**To the Applicant, Koshkonong Solar Energy Center LLC;  
the Wisconsin Public Service Commission; and other interested parties:**

**PLEASE TAKE NOTICE** that the Town of Christiana, Dane County, Wisconsin, appears by Municipal Law & Litigation Group, S.C. by H. Stanley Riffle and requests to intervene in this action. We further request that a copy of all documents filed in this action be sent to us at our offices located at 730 N. Grand Ave. Waukesha, WI 53186, [sriffle@ammr.net](mailto:sriffle@ammr.net).

The Village requests intervention as a matter of right pursuant to PSC 2.21(1), in that the Village has substantial interests that may be affected by the commission's action or inaction in the present proceeding and is entitled, by rule, to be admitted as an intervenor.

Dated this 19th day of May 2021.

MUNICIPAL LAW & LITIGATION GROUP, S.C.

**Electronically signed by H. Stanley Riffle**

H. Stanley Riffle  
State Bar #1012704

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**BEFORE THE  
PUBLIC SERVICE COMMISSION OF WISCONSIN**

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Application for a Certificate of Public Convenience and  
Necessity of Koshkonong Solar Energy Center LLC to  
Construct a Solar Electric Generation Facility in the  
Town of Christiana and the Town of Deerfield, Dane  
County, Wisconsin

9811-CE-100

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**VILLAGE OF CAMBRIDGE, DANE COUNTY, WI  
REQUEST TO INTERVENE AND NOTICE OF APPEARANCE**

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Pursuant to Wis. Admin. Code § PSC 2.21, the **VILLAGE OF CAMBRIDGE** hereby files this request to intervene in the above-captioned proceeding.

I. Some of our Interests in this Proceeding are:

- A. Our municipality acts in the substantial, financial interests of residential and commercial electric customers of Alliant Energy (Wisconsin Power & Light) who could assume a portion, or all of the costs associated with new utility infrastructure at a later date. Through the additions of the Paddock-Rockdale and Rockdale-West Middleton 345 kV transmission lines and the Rockgen Power Plant, our municipality has directly experienced the tendency of utility expansions to invite more expansion. According to the MISO interconnection queue on January 21, 2021 and the engineering plan for this docket our immediate area is being evaluated for another 345 kV expansion transmission line and 300MW as part of the Koshkonong Solar Energy Center.
- B. To date, our Village has not been able to acquire the sufficient information we require in order to evaluate the stature and impacts of the proposed Koshkonong Solar Energy Center.
- C. Our municipality has an obligation to preserve both the health and the appearance of the natural assets surrounding our community because they underpin our ability to survive and grow. Key to this is tourism and the attraction of new residents and businesses into our area with economic benefits.
- D. In response to financial and environmental priorities, residents and businesses within Village jurisdiction are developing conservation practices, making energy improvements and are increasingly adding locally owned solar resources. To improve efficiency the Village has made long term investments in updated infrastructure in partnership with neighboring communities. The long term affordability of these investments is significantly influenced by our ability to grow in accordance with our "Smart Growth Plan". Other elements include Focus on

Energy rebates benefits which are alternatives to supply side generation additions such as the Koshkonong Solar Energy Center.

- E. To that end the Village has invested in and has adhered to the aspects of the "Smart Growth Plan," which has detailed the intended pattern of growth for the Village. The possibility and need for growth are incorporated into our existing infrastructure. This is critical to the defrayment of cost related to the sewage collection and water treatment system as well as stormwater collection and treatment.
- The potential encroachment of an industrial scale non-agricultural land use for power collection with 35 year lifespan within the extra territorial boundaries detailed in our smart growth plan represent an unreasonable interference with the orderly land use and development plans for the village, constraint to our orderly growth, the proper operation and financing of our existing infrastructure as well our ability to expand.
- F. Our municipality represents residents and businesses with substantial interests as property owners facing possible losses in property values, losses of livelihood and tax base revenue over time.

II. Notice of Appearance

Until further notice, the **VILLAGE OF CAMBRIDGE** will represent our interests in this matter and ask that future documents and correspondence in this docket be served to us using the below email address.

**VILLAGE OF CAMBRIDGE**

Lisa Moen, Clerk  
Street Address,  
Cambridge WI  
608- 423-3712  
lmoen@ci.cambridge.wi.us

Our Village Board respectfully requests that the Commission grant our request to intervene in this proceeding.

Sincerely,

  
President, VILLAGE OF CAMBRIDGE

Dated this 24<sup>th</sup> day of Nov. 2021