



# Public Service Commission of Wisconsin

Phil Montgomery, Chairperson  
Eric Callisto, Commissioner  
Ellen Nowak, Commissioner

610 North Whitney Way  
P.O. Box 7854  
Madison, WI 53707-7854

Public Service Commission of Wisconsin  
RECEIVED: 06/23/14, 4:08:05 PM

June 23, 2014

## The Electronic Service List

Re: Application of Wisconsin Gas LLC, as a Gas Public Utility, 6650-CG-233  
for Authority to Construct a Natural Gas Transmission  
Lateral from the Viking Gas Transmission Company  
Interstate Pipeline to the City of Tomah, through Eau Claire,  
Jackson, Clark, and Monroe Counties, Wisconsin, to  
Provide Natural Gas to Existing and New Service Areas in  
Municipalities in the Project Area

In compliance with the June 19, 2014, Order of Administrative Law Judge Michael Newmark, in the above-named docket, a change has been made to Page 2, Issue 1, Clean Wisconsin's position.

Sincerely,

*/s/ Michael John Jaeger*

Michael John Jaeger  
Docket Coordinator  
Gas and Energy Division

XX:cmk:DL: 00929451

Attached: Decision Matrix (Revised)

Decision Matrix  
WISCONSIN GAS LLC  
Docket 6650-CG-233  
June 18, 2014

**Issue 1: Does the proposed construction project satisfy the service efficiency, future facilities need, and proportionate value requirements of Wis. Stat. § 196.49(3)(b) and the requirements of Wis. Admin. Code ch. PSC 133?**

**Issue Scope:** Does the record demonstrate sufficient information from Wisconsin Gas LLC (WG) to satisfy the statutory criterion that the proposed project, if constructed, satisfies the reasonable needs of the public for an adequate supply of natural gas without substantially impairing the efficiency of utility service, providing facilities unreasonably in excess of probable future requirements, or adding to the cost of service without proportionately increasing the value or available quantity of service, pursuant to Wis. Stat. §§ 196.49(3)(b) and the requirements of Wis. Admin. Code ch. PSC 133?

PARTY POSITIONS	AMOUNT*	TRANSCRIPT REFERENCES
<p><b>WG:</b> Yes. The Project will meet uncontested long-term demand in the region and avert a short-term gas shortage.</p> <p>The Project is the least-cost option for meeting demand. The winner of a competitive RFP process, the Project was less expensive than the next least costly bid. The Project is significantly less expensive than a stepped expansion of NNG's existing system.</p> <p>Bid evaluations showed the Project best delivers non-economic benefits to customers.</p> <p>NNG's "14 for 14" concept will not meet demand beyond 2018 and does not deliver any other benefits of the Project.</p>		<p>Direct-WG-Whitefoot-3-6, 8-9; Direct-WG-Sexton-4cr-13cr; Direct-WG-Kharouf-2-8; Rebuttal-WG-Kharouf-1-2</p> <p>Direct-WG-Sexton-14cr-22cr; Direct-WG-Whitefoot-3; Ex.-WG-Whitefoot-3p; Ex-WG-Whitefoot-4c, Att. 2</p> <p>Direct-WG-Sexton-22cr-23cr; Direct-WG-Whitefoot-3-5; Ex.-WG-Whitefoot-4c</p> <p>Direct-WG-Sexton-11pr-13pr; Direct-WG-Whitefoot-4; Rebuttal-WG-Sexton-2cr-12cr; Rebuttal-WG-Reed-7r-8r, 15r-16r, 19r; Ex.-WG-Whitefoot-84-89, 135; Ex.-WG-Bruessel-2</p>

Decision Matrix  
WISCONSIN GAS LLC  
Docket 6650-CG-233  
June 18, 2014

<b>CUB:</b> CUB is not taking a position regarding whether the project should be approved, but notes that the economic benefits attributed to the project are heavily dependent on the new commercial and industrial customers in WG's forecast actually showing up and seeking service from WG at the levels WG estimates. If the Commission approves the project, it should monitor customer growth in the area to determine whether the new load materializes and address any significant variations from the forecasted load in a future rate case.		CUB Initial Br. pp. 1-2; CUB RB, pp. 1-3; Ex.-CUB-1
<b>CW:</b> WG may be providing facilities in excess of the reasonable needs of the public, given the Northern Natural Gas Co. expansion alternative, and uncertain industrial need which is the primary basis for future requirements.		Ex.-CW-Mosca-11; Ex.-CW-Mosca-12; Ex.-CUB-1
<p><b>Commission Staff:</b> Commission staff estimated that the proposed project could raise margin rates by 8.4 percent for Route A and 8.9 percent for Route B. Estimates of an overall potential bill increase for typical WG residential customers (factoring the cost of gas) were 3.5 percent for Route A and 3.7 percent for Route B.</p> <p>The final environmental impact statement (EIS) discusses the basic purpose, costs, and alternatives of the proposed project.</p>		<p>Direct-PSC-Bauer-1 to 3</p> <p>Ex.-PSC-Jaeger and Ingwell-1 (Chapters 2 and 3)</p>
<b>COMMISSION ALTERNATIVES</b>		
<b>Alternative One:</b> The Commission determines that the proposed project is in conformance with Wis. Stat. § 196.49(3) and Wis. Admin. Code ch. PSC 133.		
<b>Alternative Two:</b> The Commission determines that the proposed project is not in conformance with Wis. Stat. § 196.49(3) and Wis. Admin. Code ch. PSC 133.		
<b>Notes:</b>		

Decision Matrix  
WISCONSIN GAS LLC  
Docket 6650-CG-233  
June 18, 2014

<b>Issue 2: Are there technically feasible and environmentally sound alternatives to building the proposed project, per Wis. Stat. §§ 1.12(4) and 196.025(1)? Specifically, is energy efficiency and conservation a reasonable alternative to the proposed project?</b>		
<b>Issue Scope:</b> This issue examines whether the evidence of record demonstrates that, apart from need and cost, the construction project complies with the state energy policy's prioritization of fuel choices and the promotion of energy conservation and efficiency.		
<b>PARTY POSITIONS</b>	<b>AMOUNT*</b>	<b>TRANSCRIPT REFERENCES</b>
<b>WG:</b> The purpose of the Project is to deliver natural gas to West Central Wisconsin and to avert impending shortages. No party submitted evidence that would support a finding that the shortages could be avoided through energy efficiency, conservation, or expansion of renewable resources.		Direct-WG-Whitefoot-3-6, 8-9; Direct-WG-Sexton-4cr-13cr; Direct-WG-Kharouf-2-8; Rebuttal-WG-Kharouf-1-2; Ex.-PSC-Jaeger and Ingwell-1, pp. 4-5; WG Initial Br. p. 23
<b>CUB:</b>		
<b>CW:</b> There is an absence of evidence in the record on Issue 2. WG has not met its burden to show the project complies with the state's energy priorities law.		
<b>Commission Staff:</b>		
<b>COMMISSION ALTERNATIVES</b>		
<b>Alternative One:</b> The Commission finds the proposed project complies with the state energy policies on prioritization of fuel choices and the promotion of energy conservation and efficiency.		
<b>Alternative Two:</b> The Commission finds that the proposed project does not comply with state energy policies on prioritization of fuel choices and the promotion of energy conservation and efficiency.		
<b>Notes:</b>		

Decision Matrix  
WISCONSIN GAS LLC  
Docket 6650-CG-233  
June 18, 2014

Issue 3: Do the proposed route options appear to be permissible under DNR waterway and wetland regulations?		
Issue Scope: DNR, under Wis. Stat. § 30.025, is required to provide an opinion that the proposed project routes are permissible when considering waterways and wetlands.		
PARTY POSITIONS	AMOUNT*	TRANSCRIPT REFERENCES
WG: Yes. Both proposed routes are permissible under Wis. Stat. § 30.025.		Direct-DNR-Brown-3r-21r
CUB:		
CW: Due to incomplete permit applications, there is insufficient information available at this time to determine whether the routes are permissible under DNR waterway and wetland regulations. Important information, such as the wetland mitigation-restoration plan and data that agency staff has requested regarding wooded wetlands, is incomplete or has not yet been provided. It is also unclear whether the applicant has sufficiently budgeted for wetland restoration and mitigation activities, which impact project cost.		Direct-CW-Mosca-7-9, 13-15; Surrebuttal-CW-Mosca-4-6; Rebuttal-WG-Grisar-16-17; Ex.-PSC-Jaeger/Ingwell-1 at 214; Ex.-CW-Mosca-7; Ex.-WG-Grisar-7; Hr’g Trp. Vol. 1 at 150:10-24, 152:5-15, 153:20-24
Commission Staff:		
DNR Staff: DNR staff testimony states that the proposed routes would be permissible.		Direct-DNR-Brown-15r
COMMISSION ALTERNATIVES		
Alternative One: The proposed route options appear permissible under DNR waterway and wetland requirements.		
Alternative Two: The proposed route options do not appear permissible under DNR waterway and wetland requirements.		
Notes:		

Decision Matrix  
WISCONSIN GAS LLC  
Docket 6650-CG-233  
June 18, 2014

<b>Issue 4: What project alignment, if any, does the Commission authorize?</b>		
<p><b>Issue Scope:</b> WG provided two overall alternate routes for the proposed project. WG also divided the overall project into nine principle sections, each with A and B segments, along with some common ties from the mainline into service areas. In addition, WG provided information on a set of sub-segment alternatives to address specific concerns at various locations along the routes. WG identified its preferred combination of segments and sub-segment alternatives.</p> <p>The Commission could discuss and select an overall route via consideration of the A and B options in each of the nine principal sections along with consideration of each the sub-segment alternatives. Another approach would be to use the WG preferred alignment as a starting point and modifying that if needed.</p> <p>Individual landowners also identified preferences or concerns regarding their properties.</p>		
<b>PARTY POSITIONS</b>	<b>AMOUNT*</b>	<b>TRANSCRIPT REFERENCES</b>
<p><b>WG:</b> WG’s preferred route with the additional adjustment discussed in footnote 2 of WG’s initial brief (and potentially Segment B8) accommodates substantially all of the landowner and Commission staff concerns identified below.</p> <p>WG’s preferred route was developed with Commission staff and DNR to minimize cost – and results in a savings of \$3.5 million over original Route A – and to minimize environmental impacts.</p> <p>The “RD-B1xA1 crossover” would add \$2.1 million to the Project’s cost compared to Route A1, and \$1.1 million compared to Route B1. The “RD-B1xA1 crossover” crosses more waterways and affects more KBB habitat than WG’s preferred route.</p>		<p>Direct-WG-Bruessel-12-13; Rebuttal-WG-Bruessel-2r-4r; Ex-WG-Bruessel-1, 3; WG Initial Br. p. 6, n. 2; Sur-surrebuttal-WG-Bruessel-1; Ex.-WG-Bruessel-4; Direct-WG-Grisar-3r</p> <p>Rebuttal-WG-Bruessel-3r; Rebuttal-WG-Grisar-3-5</p>
<b>CUB:</b>		

Decision Matrix  
WISCONSIN GAS LLC  
Docket 6650-CG-233  
June 18, 2014

<p><b>CW:</b> CW cannot recommend either route at this time due to the environmental impacts associated with both routes A and B, and the lack of complete project information. If the Commission selects a project alignment, it should obtain clarification on two route modifications recently identified by WG, which to date have only been described in narrative form: 1) rerouting in two environmentally sensitive areas in Segment A7; and 2) rerouting in Segments A9 and B9 that WG described in its initial brief, pursuant to an agreement with landowner Tim Liddane.</p>		<p>Direct-CW-Mosca-19-20; Direct-CW-Howe-12</p> <p>Rebuttal-WG-Grisar-5-6 Hr'g Trp., Vol. 1 at 148:5-150:6</p> <p>WG Initial Br. at 5 n.2 (<a href="#">PSC REF#: 205602</a>)</p>
<p><b>Landowners:</b> Richard Jung: Placing pipeline near home at intersection of Willard and Dickerson along Segment B1 would be a safety issue and would lower property values.</p>		<p>Ex.-PSC-Jaeger and Ingwell-4 at pp. 5 to 8 of 111 of the pdf</p>
<p>Scott Ellison, Chairman, town of Foster: A pipeline at the intersection of Willard and Dickerson along Segment B1 would be a safety issue for the unincorporated community around Rock Dam Lake.</p>		<p>Ex.-PSC-Jaeger and Ingwell-4 at pp. 9 and 10 of 111 of the pdf</p>
<p>John Ross, Director, Clark County Emergency Management: A pipeline at the intersection of Willard and Dickerson along Segment B1 would be a safety issue for the unincorporated community around Rock Dam Lake.</p>		<p>Ex.-PSC-Jaeger and Ingwell-4 at pp. 11 and 12 of 111 of the pdf</p>
<p>Bridget Kelley, Red Flint Group, LLC: Provided information on four property owner leases that are involved with a sand mine project. A portion of both segments A4 and B4 would negatively affect the development of this mine project, while sub-segment alternative A.4.1 would not. Another portion of segment A4 would also have a negative effect, but as there is not a sub-segment alternative that would alleviate this concern, the Commission should require WG to work with the landowners and the mine developer to shift the A4 segment to another location (would not affect other landowners).</p>		<p>Ex.-PSC-Jaeger and Ingwell-4 at pp. 15 to 47 of 111 of the pdf</p>
<p>Bill Divyak: Route A9 preferred to Route B9 near his farm.</p>		<p>Ex.-PSC-Jaeger and Ingwell-4 at pp. 50 and 51 of 111 of the pdf</p>
<p>David and Barbara Duerkop: Farm organically. Construction on segment B2 across their lands would disrupt the crop rotation practices in the areas used for construction work space.</p>		<p>Ex.-PSC-Jaeger and Ingwell-4 at p. 54 of 111 of the pdf</p>

Decision Matrix  
WISCONSIN GAS LLC  
Docket 6650-CG-233  
June 18, 2014

Raymond and Barbara Gahan: Construction of line along segment B1 would remove vegetation screening their cabins and likely affect property values.		Ex.-PSC-Jaeger and Ingwell-4 at p. 57 of 111 of the pdf
James Hoffman, Goose Island Sand Co: Construction along A3 would affect the sand mine they are currently developing. Sub-segment alternative A.3.1 would be better.		Ex.-PSC-Jaeger and Ingwell-4 at pp. 61 to 85 of 111 of the pdf Tr. pp. 199 to 204
Albert Lahmayer: Segment B6 crossing his property would greatly diminish its natural beauty.		Tr. pp. 192 to 193
Tim Liddane: Would like the pipeline to cross over on his property from segment A9 to B9 to reduce the total length on his property and to move it out of his active farmland.		Tr. pp. 204 to 205
Judy Lund: Placing pipeline near home at intersection of Willard and Dickerson along Segment B1 would be a safety issue, would lower property values, and would affect important bird habitat.		Tr. pp. 185 to 191
Bob Madvig: Pipeline along segment A5 would cross his yard and be a significant safety hazard for his family. Sub-segment alternative A.5.2 would be better.		Tr. pp. 177 to 182
Mary Melcher: Pipeline along segment A2 would be a safety hazard for her home. She is also against a proposed sand mine across the road from her house and is concerned that the proposed pipeline would increase the chances that this sand mine would proceed.		Ex.-PSC-Jaeger and Ingwell-4 at pp. 94 and 95 of 111 of the pdf
Eugene Noonan, Northern Frac Proppants: Segment A3 would run through their developing sand mine. Sub-segment alternative A.3.1 would eliminate their concerns.		Ex.-PSC-Jaeger and Ingwell-4 at pp. 97 to 104 of 111 of the pdf
James Williams: Concerned with the process WG is using trying to obtain voluntary easements. Concerned that there are other nearby existing utility corridors that WG should be following.		Ex.-PSC-Jaeger and Ingwell-4 at pp. 110 and 111 of 111 of the pdf



Decision Matrix  
WISCONSIN GAS LLC  
Docket 6650-CG-233  
June 18, 2014

<p><b>Commission Staff:</b> Commission staff noted that that the A segments in areas 1 and 7 were easier to construct and less expensive than the corresponding B segments. In addition, use of sub-segment alternatives A.5.1 and A.5.2 would be significantly less expensive than the corresponding original alignments.</p> <p>The original alignment corresponding to sub-segment alternative A.2.2 has a remaining unresolved archeological site concern.</p> <p>Commission staff suggested that if segment B1 is chosen, the Commission consider requiring WG to investigate an alternative alignment in the vicinity of the intersection of Willard and Dickerson to address the public concerns of Jung, Ellison (town of Foster), Ross (Clark County), and Lund.</p> <p>Note: Some of the specific landowner concerns are moot or reduced if WG’s preferred route is adopted (Ex-WG-Bruessel-1). The selection of Segment A1 would eliminate the concerns expressed by Jung, Ellison (town of Foster), Ross (Clark County), Gahan and Lund. The selection of Sub-segment A.3.1 would reduce the sand mine concerns of Hoffman (Goose Island Sand Co.) and Noonan (Northern Frac Proppants). The selection of Sub-segment A.4.1 would eliminate some of the sand mine concerns of Kelley (Red Flint Group). The selection of A5 would eliminate the concern of Lahmayer. The selection of Sub-segment A.5.2 would reduce the concern of Madvig. The selection of Segment A9 would eliminate the concern of Divyak.</p>		<p>Direct-PSC-Stemrich-3 to 4</p> <p>Direct-PSC-Jaeger and Ingwell-4r</p> <p>Tr. pp. 144 to 146</p>
<p><b>DNR Staff:</b> DNR staff noted that the Route A segment options affect fewer waterways and wetlands than the Route B segment options. In addition, DNR staff testified that the RD-B1xA1 crossover configuration would result in lower wetland impacts than either the A1 or B1 segments in their original configuration.</p>		<p>Direct-DNR-Brown-7r, 12r to 13r, and 15r</p>
<p><b>COMMISSION ALTERNATIVES</b></p>		
<p><b>Alternative One:</b> The Commission selected the WG preferred alignment to be the authorized route with no modifications.</p>		
<p><b>Alternative Two:</b> The Commission selected the WG preferred alignment to be the authorized route some modifications.</p>		
<p><b>Alternative Three:</b> The Commission identified the authorized route as a combination of specific segments and sub-segment alternatives.</p>		

Decision Matrix  
WISCONSIN GAS LLC  
Docket 6650-CG-233  
June 18, 2014

**Notes:**

Decision Matrix  
WISCONSIN GAS LLC  
Docket 6650-CG-233  
June 18, 2014

<b>Issue 5: What general conditions, if any, should be attached to construction of the proposed project to meet the requirements of Commission approval?</b>		
<b>Issue Scope:</b> WG's application described multiple construction methods and conditions the WG has committed to implement in order to reduce potential project impacts to landowners, land use, and environmental resources along the project route. The issue is whether these commitments by WG be incorporated as part of any authorization of the proposed project?		
<b>PARTY POSITIONS</b>	<b>AMOUNT*</b>	<b>TRANSCRIPT REFERENCES</b>
<b>WG:</b> WG should be held to the construction methods and conditions to which it committed in the Project application, as modified during the review and hearing process. No further specification of each individual commitment is necessary.		Ex.-WG-Whitefoot-2; Ex-PSC-Jaeger/Ingwell-1; WG Reply Br. p. 2
<b>CUB:</b>		
<b>CW:</b> Additional safeguards/clarifications are needed beyond those proposed by the applicant. The application's general construction methods/conditions are vague, inadequate, and unenforceable, allowing substantial leeway to impact the environment. For example, WG testimony on corridor width has been inconsistent, and WG has provided few details on revegetation and long-term corridor maintenance even though these activities can substantially contribute to habitat fragmentation. Other impacts depend on plans that have not been finalized or are not site-specific. Any approval of the application should include order points that strengthen and clarify construction and maintenance methods, as specified in CW's initial brief, pp. 7-27. ( <a href="#">PSC REF#: 205630.</a> )		Direct-CW-Mosca-9-22; Surrebuttal-CW-Mosca-1-8; Direct-CW-Howe-3-13; Surrebuttal-CW-Howe-1-6; Ex-CW-Mosca-2; Ex-CW-Mosca-9; Ex-CW-Mosca-10; Ex-CW-Mosca-14
<b>Commission Staff:</b> The analysis of the proposed project by Commission staff, including the EIS that was prepared, assumes that the multiple construction methods and conditions described in WG's application to reduce potential project impacts are implemented.  Note: This Issue and Issue 6 overlap. Commission staff has framed the alternatives in this Issue to address the overall reasonableness of WG's general construction and mitigation methods. The need, if any, for additional specific measures has been framed in Issue 6.		Ex.-PSC-Jaeger and Ingwell-1

Decision Matrix  
WISCONSIN GAS LLC  
Docket 6650-CG-233  
June 18, 2014

COMMISSION ALTERNATIVES
<b>Alternative One:</b> The Commission finds that it is reasonable to incorporate all of the general construction methods and conditions committed to by WG in its application as part of the project authorization without needing to specifically identify each commitment.
<b>Alternative Two:</b> The Commission finds that the general construction methods and conditions committed to by WG in its application are inadequate.
<b>Notes:</b>

Decision Matrix  
WISCONSIN GAS LLC  
Docket 6650-CG-233  
June 18, 2014

<b>Issue 6: What additional construction or routing mitigation measures in addition to those proposed as part of WG's application, if any, should be attached to construction of the proposed project to meet the requirements of Commission approval?</b>		
<b>Issue Scope:</b> Should additional construction methods and conditions beyond those identified in WG's application be required to further reduce potential project impacts?		
<b>PARTY POSITIONS</b>	<b>AMOUNT*</b>	<b>TRANSCRIPT REFERENCES</b>
<b>WG:</b> Wisconsin Gas should be required to: 1) comply with all applicable laws and regulations concerning construction of the Project; and 2) comply with all conditions contained in environmental permits for the Project. No additional construction or routing mitigation measures should be imposed for construction.		Ex.-PSC-Jaeger/Ingwell-1; WG Reply Br. p. 2.
<b>CUB:</b>		
<b>CW:</b> Additional construction/routing mitigation and monitoring measures are needed to reduce the project's environmental impacts during and after construction. CW has proposed a number of such measures in its initial brief and respectfully asks the Commission to adopt them as order points. CW also requests that the applicant provide additional information that will help reduce environmental impacts and prevent potential conflicts during and after construction, such as enhanced surveys for endangered and threatened species and better identification of upland forest types. CW Br. at 7-27. ( <a href="#">PSC REF#: 205630.</a> )		Direct-CW-Mosca-9-22; Surrebuttal-CW-Mosca-1-8; Direct-CW-Howe-3-13; Surrebuttal-CW-Howe-1-6; Ex.-WG-Grisar-5; Ex.-WG-Grisar-6 Hr'g Trp. Vol. 1 at 123:1-15, 133:1-15, 162:8-163:2
<b>Commission Staff:</b>		
<b>COMMISSION ALTERNATIVES</b>		
<b>Alternative One:</b> The Commission finds that no additional construction methods or conditions need be specified as part of project approval.		
<b>Alternative Two:</b> The Commission finds that additional construction methods or conditions are needed as part of project approval.		
<b>Notes:</b>		

Decision Matrix  
WISCONSIN GAS LLC  
Docket 6650-CG-233  
June 18, 2014

Issue 7: Should the Commission define the scope of new customers that can be served from the initial construction of the proposed project without requiring any gas extension construction contributions under WG’s extension rule tariffs?		
<b>Issue Scope:</b> WG’s application identified two villages (Fairchild and Warrens) and nine towns in which it is seeking authority to provide natural gas service from the proposed project. Included in two of the towns are the unincorporated communities of Millston and Humbird. Typically, a utility must initiate service within a year of the Commission authorization or the authority lapses. The initial service to the new areas from the proposed project would occur without any extension rule gas main customer contributions. The Commission may consider a time restriction for this, after which extension rule main contributions may be applicable to new customers.		
PARTY POSITIONS	AMOUNT*	TRANSCRIPT REFERENCES
<b>WG:</b> Properties crossed by, or directly adjacent to, the lateral (as well as customers at the locations listed in Mr. Bruessel’s rebuttal testimony) should be considered part of the Project, and should not be required to contribute to the cost of mains installation.		Rebuttal-WG-Bruessel-7r-8r
The Commission should order a five-year period (2015-2019) for customers to sign up for natural gas service.		Rebuttal-WG-Bruessel-8r
<b>CUB:</b>		
<b>CW:</b>		
<b>Commission Staff:</b> Customers served in the new service areas during 2015 and 2016 should not be subject to main extension rule contributions. New customers served in 2017 or later would be subject to applicable extension rule gas main contributions.		Direct-PSC-Stemrich-4
COMMISSION ALTERNATIVES		
<b>Alternative One:</b> The Commission finds that WG’s proposal to serve new customers in the project area for a 5 year period without requiring any main extension contributions is reasonable.		
<b>Alternative Two:</b> The Commission finds that it is reasonable to allow new customers to be served in the project area without requiring any main extension contribution if they are served by the end of 2016.		
<b>Notes:</b>		

Decision Matrix  
WISCONSIN GAS LLC  
Docket 6650-CG-233  
June 18, 2014

<b>Issue 8: Should minor routing flexibility be allowed and, if so, what process should be followed?</b>		
<b>Issue Scope:</b> WG has proposed an approach that would allow some post-authorization changes to the authorized route alignment to be made without requiring a full review by full Commission.		
<b>PARTY POSITIONS</b>	<b>AMOUNT*</b>	<b>TRANSCRIPT REFERENCES</b>
<b>WG:</b> The Commission should authorize Wisconsin Gas to make “minor” changes to the route. Changes to the route should be considered “minor” if the change: <ol style="list-style-type: none"> <li>1. Does not move the pipe location more than 200 feet;</li> <li>2. Does not affect new landowners on the selected route;</li> <li>3. Does not affect additional wetlands, archaeological sites, waterways, or occupied endangered species habitat; and</li> <li>4. Is agreed to by the landowner.</li> </ol>		Direct-WG-Bruessel-11-12
<b>CUB:</b>		
<b>CW:</b> Yes, except WG’s proposed approach allows too much flexibility that could result in substantial environmental impacts with little oversight. CW’s reply brief suggests three order points that will clarify “minor” route adjustments by: 1) more precisely defining what types of environmental impacts may occur for a route adjustment to still qualify as “minor”; 2) making the width of a “minor” route adjustment consistent with the permanent/temporary easement width; and 3) requiring notice of the route adjustment to agency staff. CW requests that the Commission adopt these points in its final order. (CW Reply Br. at 11, <a href="#">PSC REF#: 205941</a> .)		Direct-WG-Bruessel-11; Direct-CW-Mosca-9-11; Direct-CW-Howe-7-8 Ex.-CW-Mosca-2; Ex.-CW-Mosca-14; Ex.-CW-Howe-9; Ex.-WG-Whitefoot-2p at 4-5; Hr’g Trp. Vol. 1 at 39:4-16, 40:1-25, 51:11-21
<b>CW:</b>		
<b>Commission Staff:</b>		
<b>COMMISSION ALTERNATIVES</b>		
<b>Alternative One:</b> The Commission finds that the minor route adjustment process proposed by WG is reasonable.		
<b>Alternative Two:</b> The Commission finds that specific changes to the route adjustment process proposed by WG are appropriate.		
<b>Alternative Three:</b> The Commission finds that all route adjustments must be brought back to for review and approval by the full Commission.		
<b>Notes:</b>		

Decision Matrix  
WISCONSIN GAS LLC  
Docket 6650-CG-233  
June 18, 2014

Issue 9: Should WG be required to directly connect the proposed pipeline with the high-pressure pipelines of Northern Natural Gas Company (Northern)?		
Issue Scope: The high-pressure gas pipeline proposed by WG would not connect directly to Northern’s high-pressure lines serving the Black River Falls and Tomah areas. The issue is whether WG should directly connect with the existing Northern pipelines as a potential to increase reliability in emergency situations.		
PARTY POSITIONS	AMOUNT*	TRANSCRIPT REFERENCES
WG: These connections were not proposed as part of the Project and are not included in the Project cost. These connections would potentially subject the project to FERC jurisdiction. Even if this legal problem did not exist, there are significant engineering, technical and contracting issues, as well as agreement from NNG, that would need to be resolved before connection could be considered. Further, the proposed connections would require extensive evaluation of environmental impacts, regulatory approvals, and land acquisition. The record in this case does not support an order that WG attempt to coordinate these connections.		Rebuttal-WG-Bruessel-5r-6r; WG Legal Opinion on FERC Jurisdictional Issue ( <a href="#">PSC REF#: 206174</a> )
CUB:		
CW:		
Commission Staff: Commission staff suggests that WG attempt to make a direct connection of the proposed project facilities with Northern’s high-pressure lines serving Tomah and Black River Falls. This could increase overall system reliability in emergency situations where a loss of service upstream from these communities occurs on either high-pressure system.		PSC-Direct-Stemrich-2 to 3
COMMISSION ALTERNATIVES		
Alternative One: The Commission finds that WG should attempt to coordinate a direct connection of the proposed project facilities with the high-pressure pipeline system of Northern at Tomah and Black River Falls.		
Alternative Two: The Commission finds that it is not necessary to encourage WG to interconnect the proposed project with the high-pressure system of Northern.		
Notes:		



Decision Matrix  
WISCONSIN GAS LLC  
Docket 6650-CG-233  
June 18, 2014

<b>Issue 10: Has the Commission complied with the Wisconsin Environmental Policy Act (WEPA) pursuant to Wis. Stat. § 1.11 and Wis. Admin. Code ch. PSC 4?</b>		
<b>Issue Scope:</b> This issue is whether the Commission, in compliance with WEPA and Wis. Admin. Code ch. PSC 4, has properly recognized and assessed potential environmental concerns arising from the construction and subsequent operation of the proposed project.		
<b>PARTY POSITIONS</b>	<b>AMOUNT*</b>	<b>TRANSCRIPT REFERENCES</b>
<b>WG:</b> The Commission staff/DNR final EIS complies with WEPA. The potential for construction of additional frac sand facilities is too speculative to qualify as an “indirect effect” of the Project. The frac sand industry has experienced rapid growth without the Project, and factors other than the availability of natural gas are likely to spur future growth in the industry.		Ex.-PSC-Jaeger and Ingwell-1, p. 212
<b>CUB:</b>		
<b>CW:</b> The EIS is not in compliance with Wis. Stat. § 1.11 and Wis. Admin. Code ch. PSC 4 because it fails to discuss the indirect environmental effects of the project. The project will largely serve new industrial (frac) sand mines, which will likely have significant environmental impacts, such as increased air pollution, reduced quality of life for nearby residents, and accelerated declines in the amount and quality of species identified in the project application. The final EIS should be revised to include a discussion of these impacts consistent with legal authority requiring analysis of indirect project impacts.		Direct-CW-Howe-7; Ex.-PSC-Jaeger/Ingwell-4 at 48, 57, 89, 92, 96, 93-94; Ex.-PSC-Jaeger/Ingwell 1r at 12, 16, 212; Ex.-WG-Whitefoot-2p at 14-15; Ex.-CUB-1; Direct-WG-Sexton at 11p; Direct-WG-Whitefoot-3
<b>Commission Staff:</b> Commission staff prepared an EIS that followed the requirements of Wis. Stat. § 1.11 and Wis. Admin. Code ch. PSC 4.		Direct-PSC-Jaeger and Ingwell-2r; Ex.-PSC-Jaeger and Ingwell-1
<b>COMMISSION ALTERNATIVES</b>		
<b>Alternative One:</b> The Commission’s analysis and review of the proposed project meets the requirements of Wis. Stat. § 1.11 and Wis. Admin. Code ch. PSC 4.		
<b>Alternative Two:</b> The Commission’s analysis and review of the proposed project does not meet the requirements of Wis. Stat. § 1.11 and Wis. Admin. Code ch. PSC 4.		

Decision Matrix  
WISCONSIN GAS LLC  
Docket 6650-CG-233  
June 18, 2014

**Notes:**

MJJ:jlt:DL: 00928200