## **EDWARD S. MARION** ATTORNEY-AT-LAW, L.L.C.

EDWARDMARION@CHARTER.NET • (608) 334-9741

716 OTTAWA TRAIL, MADISON, WI 53711

March 17, 2009

Sandra J. Paske Secretary to the Commission Public Service Commission of Wisconsin 610 N. Whitney Way Madison, Wisconsin 53707-7854

VIA: ERF

Re: Glacier Hills Wind Park, Docket No. 6630-CE-302

Dear Ms. Paske:

Submitted herewith is the Request to Intervene of Neighbors Caring About Neighbors.

Thank you very much.

cc: Service List



## BEFORE THE PUBLIC SERVICE COMMISSION OF WISCONSIN

Application of Wisconsin Electric Power Company for a Certificate of Public Convenience and Necessity to Construct a Wind Electric Generation Facility and Associated Electric Facilities to be known as the Glacier Hills Wind Park, Located in the Towns of Randolph and Scott, Columbia County, Wisconsin

Docket No. 6630-CE-302

## **REQUEST TO INTERVENE**

Pursuant to Wis. Stat. § 227.44 (2m) and Wis. Admin. Code § 2.21, Neighbors Caring About Neighbors (NCAN") hereby requests to intervene in this docket.

- 1. NCAN is a 501 (3) (c) not for profit organization, with approximately 200 members, all or most of whom live within or adjacent to the proposed Glacier Hills Wind Park (the "GHWP"). The mission of NCAN is the preservation of rural Wisconsin life, which embodies the community's health, safety, quality of life, and landscape. NCAN and its members are concerned about the health and safety impacts of the GHWP and the facility's impact on property values. The Coalition for Wisconsin Environmental Stewardship ("CWESt") submitted information about NCAN in support of CWESt's request for intervener compensation. PSC Ref#: 115941. NCAN is affiliated with CWESt.
- 2. Although it was an active party through the issuance of the Final Decision, CWESt does not expect to participate further in this docket. Because CWESt represented NCAN's interests, it was not necessary for NCAN to ask for party status until now. With the expected lack of further participation by CWESt, it is now necessary for NCAN to

become a party.

3. In its application to construct the GHWP, Wisconsin Electric Power Company

("WEPCO") represented to the Commission that the company "possesses the necessary

control of lands required for alternative and preferred turbine sites, cables and roads, and

O&M facility via easements and easement and purchase options." Application, PSC

REF#: 103284, p.2. At the present time, however, WEPCO is aggressively pursuing

additional easements for the installation and maintenance of underground electric cables

and communication wires.

3. The Commission's final decision granted WEPCO the authority to make minor

modifications to the project upon notice to commission staff, in some cases, and with the

approval of staff, in other cases. The decision rejected WEPCO's request to make certain

other modifications.

4. Parties and the affected public should be entitled to review and to comment on

WEPCO's proposed modifications. Party status will ensure that the interests of the

affected community --previously represented by CWESt-- will continue to be

represented, through that review and comment.

March 17, 2010

NEIGHBORS CONCERNED ABOUT NEIGHBORS

By /s/ Edward S. Marion

Edward S. Marion Attorney-at-Law, L.L.C.

716 Ottawa Trail Madison, WI 53711 (608) 334-9741 marionllc@me.com

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