



Public Service Commission of Wisconsin

Lon Roberts, Chairperson
Mike Huebsch, Commissioner
Rich Zipperer, Commissioner

4822 Madison Yards Way
P.O. Box 7854
Madison, WI 53707-7854

December 12, 2018

Re: Application for a Certificate of Public Convenience and
Necessity of Two Creeks Solar, LLC to Construct a Solar
Electric Generation Facility, to be Located in Manitowoc
and Kewaunee Counties, Wisconsin

9696-CE-100

To the Person Addressed:

The Public Service Commission of Wisconsin (Commission) received an application from Two Creeks Solar, LLC (Two Creeks) for the construction of a new solar electric generation facility and associated facilities. The Commission also received an application from Two Creeks to construct an electric tie line to connect the solar facility to the existing transmission grid. The project is located in the towns of Two Creeks and Two Rivers in Manitowoc County and the town of Carlton in Kewaunee County. The Commission is sending this letter to property owners near the proposed solar facility site or directly along the proposed routes of the tie line as well as individuals who have asked to be placed on our mailing list. It is also being sent to public officials who may wish to place this notification in a location where it can be viewed by the public.

The solar electric generation facility is a Type III action under Wis. Admin. Code § PSC 4.10(3). Type III actions normally do not require preparation of an environmental assessment (EA) or an environmental impact statement (EIS) under Wis. Admin. Code § PSC 4.10(3). However, an evaluation of a specific Type III proposal may indicate that the preparation of an EA is warranted for that proposal. Commission staff from the Division of Energy Regulation completed an environmental review of the proposed project and prepared an EA to determine if an EIS is necessary. A notification of the Commission's intent to prepare an EA, including a solicitation for comments on the environmental aspects of this project, was mailed to landowners, local and regional media, affected municipal entities, the regional planning commission, and area legislators in the project area on September 18, 2018.

The preliminary determination indicates that no significant impacts on the human or natural environment are likely to occur as a result of the construction and operation of this project. Therefore, preparation of an EIS is not required. Comments regarding this determination can be directed to the contact person listed at the end of this letter. The remainder of this letter describes the primary impacts of the project and summarizes the conclusions of the EA. To obtain a copy of the EA, please request a copy from the contact person listed at the end of this letter.

Proposed Project

Two Creeks is proposing a 150 megawatts photovoltaic (PV) solar electric generation facility. The project would be located on approximately 1,300 acres of primarily agricultural land in

Manitowoc and Kewaunee counties. The major components of the project would include the PV panels, power conversion units, inverters, collection lines, a collector substation, and an operation and maintenance building. The proposed project includes proposed sub-array areas that are separately fenced, with alternate sub-arrays to be used if needed. The solar PV array would interconnect to a new 138 kilovolt (kV) project collector substation using a 34.5 kV underground collection system. At the collector substation, the voltage would be stepped up from 34.5 kV to 138 kV. The proposed 138 kV generator tie line would carry the electricity to the existing Kewaunee Switchyard where it would interconnect to the existing electric grid.

The proposed solar array locations are between State Highway (STH) 42 to the west and Lake Shore Road to the east. The locations of proposed solar arrays are south of Point Beach Nuclear Plant, from just south of Nuclear Road to County Highway (CTH) V, with some alternate solar array sites extending south of CTH V. The solar collection lines would extend north from the edge of the arrays for approximately two miles to the proposed solar collection substation, just east of STH 42 and approximately 0.4 miles north of East Tapawingo Road.

Two Creeks will acquire solar easement rights from the properties needed for the project as well as lease rights for the placement of solar panels and associated equipment. Two Creeks would develop, construct, and operate the generation facility. In a separate docket before the Commission,¹ Madison Gas and Electric, and Wisconsin Public Service Corporation propose to purchase the Two Creeks solar generation facility and tie line, as well as an additional proposed solar electric generation facility in Iowa County, Wisconsin.

Potential Natural Resources and Social Impacts

The proposed project would cause environmental impacts based on the surrounding land use, habitats, and features such as wetlands, waterways, and presence of rare species.

During construction activities, there would be increased noise, dust and vibration in the construction areas. There would be increased traffic in the project area as employees and deliveries arrive at and leave the project work areas. Loose or disturbed soils could be susceptible to erosion. Two Creeks is working on a vegetation management plan that would address erosion and storm water risks, and provide information on restoration activities.

Animals and vegetation in the project area could be displaced or damaged as a result of construction activities. There would be temporary and permanent impacts to wetlands, although if constructed as described in the application, these would be minor. Solar PV projects of this scale have not been built in Wisconsin, and are relatively new to the upper Midwest, so there is some uncertainty as to how wildlife will interact with different parts of the facility.

A visual change in the project area from open agricultural fields to a more industrial landscape would affect likely viewers differently. All of the sub-arrays would be fenced off, with Two

¹ Docket 5-BS-228

Creeks proposing to use six-foot chain link fence with an additional foot of barbed wire on the top. Some landowners that do not receive direct benefits from the project may react more negatively to the proposed project. Site-specific landscaping plans might limit the impacts to adjacent landowners.

Construction in and through agricultural fields would result in both temporary and long-term impacts. Some areas, such as laydown yards and temporary access roads would only be taken out of production during the construction phase of the project. The solar PV arrays, new collector substation, and operations and maintenance building would be out of agricultural production for the operational life of the project, potentially 50 years. Soil compaction or topsoil loss in agricultural fields are serious concerns and can impact future productivity. If drainage tiles are broken or damaged, the drainage on a field could be impacted, although some impacts might not be immediately known. The use of BMPs and post-construction soil restoration could reduce many direct impacts to agricultural operations. It is not well known whether decommissioning the project site can allow for a return of impacted properties to agricultural use. It is likely that thorough decommissioning, including decompacting soils and repairing any damaged drainage tiles, would allow for a return to agricultural use.

Conclusion

The project as proposed in the application and subsequent filings, including use of the stated construction methods and implementation of the mitigation plans, is not expected to cause any significant environmental effects. There would probably be noticeable construction traffic on some of the county and town roads in the project area, consisting of workers' vehicles, delivery trucks, and construction machinery. A change in the landscape from agricultural fields to a more developed area with panels, associated facilities, and fencing would be noticeable to landowners and those driving through the area.

No significant impacts on the human environment that would warrant the preparation of an EIS are expected if this project were constructed using some combination of the currently proposed array sites. Thus, preparation of an EIS, as described in Wis. Stat. § 1.11, is not required for this project.

Copies of the EA are available upon request, either in electronic or paper format (for a paper copy, an address must be provided). Requests for a copy of the EA should be made to Adam Ingwell at the Public Service Commission of Wisconsin by telephone at (608) 267-9197, by e-mail at adam.ingwell@wisconsin.gov, or by regular mail directed to the Public Service Commission, P.O. Box 7854, Madison, Wisconsin 53707-7854.

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Comments on the finding of no significant impact for this proposed project should be made to Adam Ingwell at the address above, by email, or through the Commission's web comment form. Go to the Commission's web site at <http://psc.wi.gov> , click on "File a Comment" button. On the next page, select the "File a comment" link that appears for docket number 9696-CE-100.

All comments must be received by Monday January 7, 2019.

A handwritten signature in black ink that reads "Adam Ingwell". The signature is written in a cursive style with a large initial "A".

Adam Ingwell
Environmental Affairs Coordinator – Supervisor
Division of Energy Regulation

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