

**STATE OF ILLINOIS
ILLINOIS COMMERCE COMMISSION**

ILLINOIS COMMERCE COMMISSION)

Petition for a Certificate of Public)
Convenience and Necessity, pursuant)
to Section 8-406.1 of the Illinois Public)
Utilities Act, and an Order pursuant to)
Section 8-503 of the Public Utilities Act,)
to Construct, Operate and Maintain a)
New High Voltage Electric Service Line)
and Related Facilities in the Counties of)
Adams, Brown, Cass, Champaign,)
Christian, Clark, Coles, Edgar, Fulton,)
Macon, Montgomery, Morgan, Moultrie,)
Pike, Sangamon, Schuyler, Scott and)
Shelby, Illinois.)

Docket No. 12-0598

INITIAL BRIEF

OF

Wind on the Wires

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JUNE 3, 2013

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Wind on the Wires, by and through its counsel, pursuant to Section 200.800 of the Commission's Rules of Practice (83 Ill. Adm. Code 200.800) and the schedule stated in the "Revisions to December 14, 2012 Case Management Plan" in the Administrative Law Judge's Notice of January 24, 2013, respectfully submits its Initial Brief in the above captioned matter.

Wind on the Wires' brief will address a few key points in the criteria for granting a certificate of public convenience and necessity for the transmission line proposed by Ameren Transmission Company ("ATXI"). More specifically, our brief will address how the transmission line ("Illinois Rivers Project") will promote the development of an effectively competitive electricity market that operates efficiently, will promote the development of a competitive market for *renewable* electricity, and whose costs and benefits are equitably distributed. Wind on the Wires will not address issues in Section III -- Recommended Route of the Transmission Line.

I. INTRODUCTION

The Illinois Rivers Project traverses Illinois, originating in Palmyra, Missouri and terminating in Indiana in a connection with a 345kV line. However, within the MidContinent Independent System Operator's Multi-Value Project ("MVP") Portfolio the Illinois Rivers Project is planned to interconnect with transmission projects that continue North from Palmyra, Missouri into Iowa. Overall, the Illinois Rivers Project is four of a portfolio of seventeen transmission projects approved by MidContinent Independent System Operator ("MISO") for

development over the next six years in multiple states by multiple transmission owners. The MVP Portfolio that the Illinois Rivers Project is part of was developed to “enable the reliable delivery of the aggregate of current state RPS [renewable portfolio standard] mandates within MISO, and provides for economic benefits in excess of the portfolio costs primarily by reducing production costs.” (MISO Exh. 1.0 at 16-17).

The Illinois Rivers Project will allow greater amounts of low-cost wind energy resources to reach Illinois consumers, which promotes the development of an effectively competitive electricity market that operates efficiently and thereby lowering both the costs for meeting Illinois consumers’ needs for electricity and Renewable Energy Credits (“RECs”). The Illinois Rivers Project facilitates the development of wind energy resources both within Illinois, in states adjacent to Illinois and in states upstream of the origination point in Palmyra, Missouri. Within Illinois, the Illinois Rivers Project will enable wind energy developers to locate wind farms along the path of the line. Wind energy developers can also locate wind farms along the transmission lines that traverse the northwest corner of Missouri and cross the eastern portion of Iowa, as identified through the analysis of the MVP Portfolio. All of these segments of the transmission line will allow more wind generation to be developed than if the lines were not built. Therefore, it creates the potential for the development of more wind generation than otherwise would be built, provides the potential for keeping both wholesale electricity prices and the cost of renewable electricity low for Illinois ratepayers, and acts as a hedge against fuel price volatility.

The additional transmission capacity provided by the Illinois Rivers Project reduces wholesale electricity costs by mitigating transmission congestion and curtailment of wind generators. Moreover, studies show that transmission lines have the potential to act as a hedge against fuel price volatility. Studies, also, generally support the proposition that transmission lines also reduce the ability of electricity suppliers to exert market power over electricity prices.

Thus, the Illinois Rivers Project meets the key hurdle of the legal standard – that it “. . . will promote the development of an effectively competitive electricity market that operates efficiently . . .” (See 220 ILCS 5/8-406.1(f))

II. REQUIREMENTS FOR A CERTIFICATE OF PUBLIC CONVENIENCE AND NECESSITY

A. Legal Standards

The key legal standard for granting the CPCN is captured within section 8-406.1(f):

(f) The Commission shall, after notice and hearing, grant a certificate of public convenience and necessity filed in accordance with the requirements of this Section if, based upon the application filed with the Commission and the evidentiary record, it finds the Project will promote the public convenience and necessity and that all of the following criteria are satisfied:

- (1) That the Project is necessary to provide adequate, reliable, and efficient service to the public utility's customers and is the least-cost means of satisfying the service needs of the public utility's customers or ***that the Project will promote the development of an effectively competitive electricity market that operates efficiently, is equitable to all customers,*** and is the least cost means of satisfying those objectives.

- (2) That the public utility is capable of efficiently managing and supervising the construction process and has taken sufficient action to ensure adequate and efficient construction and supervision of the construction.
- (3) That the public utility is capable of financing the proposed construction without significant adverse financial consequences for the utility or its customers.
(220 ILCS 5/8-406.1(f) (*emphasis added*))

A competitive electricity market includes, but is not limited to, wholesale electricity prices as well as prices for renewable electricity. Illinois is served by two wholesale electric markets – Midcontinent Independent System Operator (“MISO” formerly Midwest Independent System Operator) and PJM. The wholesale electric market in which the Illinois Rivers Project would be built is operated by MISO.

The Illinois Rivers Project is also beneficial for renewable electricity prices in Illinois due to Illinois’ renewable portfolio standard (“RPS”). Illinois has a RPS that requires a minimum percentage of the total supply used to serve the load of Commonwealth Edison (“ComEd”), Ameren Illinois (“Ameren”)(jointly referred to as “Illinois utilities”) and alternative retail electric suppliers (“ARES”) to come from renewable energy resources. (See 20 ILCS 3855/1-75(c) for utility requirements, and 220 ILCS 5/16-115D for ARES requirements)

The utility procurement of renewable energy and renewable energy credits is managed by the Illinois Power Agency (“IPA”) and reviewed and approved by the Illinois Commerce Commission. The standard is to procure “cost-effective renewable energy resources.” There are two components to being cost-effective. First, the bid price of the product must be below a benchmark value

established pursuant to section 1-75(c)(1). Second, the costs of procuring renewable energy resources do not exceed the limit stated in section 1-75(c)(2).

The RPS for ARES is slightly different than what applies to the utilities. (See 220 ILCS 5/16-115D for ARES requirements) ARES can self-procure up to 50% of their requirement and they also make annual alternative compliance payments (“ACP”) into a Renewable Energy Resources Fund managed by the IPA. The relevant statutory language regarding a competitive market relates to the ACP rate. The ACP rate is the equivalent of what the utilities pay for their renewable energy resources. (See §5/16-115D(d)).

As discussed below, the Illinois Rivers Project will facilitate the development of more wind energy than would otherwise be built in the absence of this line and that energy will reduce the overall cost of renewable products available for Illinois utilities and ARES, thus promoting an efficient and effectively competitive renewable electricity market within Illinois.

B. Argument

The statute requires “that the Project will promote the development of an effectively competitive electricity market that operates efficiently, is equitable to all customers, . . .” Our arguments below discuss how the Illinois Rivers Project provides Illinois ratepayers a larger supply of renewable energy to comply with the Illinois Renewable Portfolio Standards (“RPS”), helping to ensure that the required procurement of renewable energy or renewable energy credits (“RECs”) is cost effective. This promotes a “competitive renewable electricity market” in

Illinois. Another benefit to Illinois consumers is that the transmission facility and the greater access to wind energy resources will lower consumer electricity costs and provide a hedge to fuel price volatility, both of which facilitate an effectively “competitive electricity market that operates efficiently.” The final point we address below is that the benefits of high-voltage transmission projects, such as Illinois Rivers Project, are inherently equitably allocated to consumers.

1. The Illinois Rivers Project Promotes a Competitive Renewable Electricity Market in Illinois

The Illinois Rivers Project is intended to facilitate wind development in Illinois, Iowa, and Missouri, and deliver that wind energy to load centers in Illinois. Illinois has a statutorily driven demand for renewable energy, requiring electricity suppliers to provide a certain percentage of their electricity from renewable energy and wind generation. The Illinois Rivers Project enables additional wind capacity to be built to meet state renewable energy requirements in all of MISO’s states. The additional wind capacity that would be built as a result of this line would help keep the costs low for renewable energy and RECs for all states within MISO, such as Illinois. If the Illinois Rivers Project is not approved, there will be a reduction in the amount of renewable energy from wind and that will drive-up the cost of renewable energy and RECs for Illinois electric consumers.

The Illinois RPS drives the need for renewable energy in Illinois. In its efforts to provide a more diverse and cleaner energy portfolio, the Illinois General

Assembly enacted laws that require utilities and ARES to procure an amount of renewable energy or RECs equal to a certain percentage of their overall delivered energy. Utilities are to procure cost effective renewable energy or RECs from Illinois or adjacent states. If they cannot meet their target percentage from resources within that area then the utilities may procure it from anywhere within the United States. (20 ILCS 3855/1-75(c)(3)). The ARES have a different geographic scope. They are allowed to procure RECs from anywhere within PJM or MISO. (220 ILCS 5/16-115D(a)(4)).

It is estimated that approximately 3,000 to 4,000 megawatts of incremental wind capacity, beyond what is installed as of the end of 2012, will be needed for the utilities and ARES to satisfy the requirements of the Illinois RPS. (WOW Exh. 1.0 at 9). To meet the Illinois RPS requirements in a cost effective manner through 2026, more renewable energy supply, such as wind generation, needs to be placed into operation.

MISO's analysis indicates that Illinois' incremental need for wind generation, in addition to what is available in 2012, would be most efficiently met with a combination of in-state and out-of-state wind generation. (See Id. citing MISO Multi Value Project Portfolio: Results and Analyses ("MISO MVP Report") at 3 (January 5, 2012)). MISO's analysis indicates that the Illinois Rivers Project facilitates development of wind generation within and outside of Illinois.

MISO identified and analyzed zones in which future wind development is likely to occur and be most cost-effective through a study known as the Regional Generation Outlet Study ("RGOS"). (See id., citing MISO MVP Report at 4).

Those wind zones are throughout the MISO footprint, including northwest Missouri, Iowa, as well as Minnesota and the Dakotas. (See WOW Exh. 1.2) Those five states have the potential wind capacity of 2,838,000 megawatts. (WOW Exh. 1.0 at 3). These areas also have generating capabilities – commonly referred to as generating capacity factors -- higher than Illinois. Consequently, the cost per megawatt-hour of wind energy produced in those states is lower than the cost of wind energy produced in Illinois. (See id. at 5) Thus, improving transmission to those areas ensures that the renewable energy market in MISO has access to lower cost wind energy for compliance with the Illinois RPS.

The Illinois Rivers Project is the back-bone for bringing wind energy across MISO and helps reduce curtailment of wind generation. Wind energy curtailment is a reduction of electricity output pursuant to directions from MISO. MISO curtails wind when the electricity output from operating wind farms exceeds the local transmission capacity. (See id. at 12). Wind energy curtailment reduces the supply of wind energy available to comply with the Illinois RPS, and also tends to reduce the economic competitiveness of wind generation. (See id. at 13-14).

The main way in which electric congestion on the transmission grid is relieved is through the addition of more transmission facilities. (See id. at 11). The MVP lines were specifically chosen by MISO to facilitate development of enough wind capacity to meet the renewable energy requirements of states in the MISO footprint out to 2026. (See id. at 13-14, *citing* MISO MVP Report at

48). If the Illinois Rivers Project is not built then the potential wind energy available to meet state requirements in 2026 will be reduced, because approximately 34% of existing and planned wind development within MISO would need to be curtailed. That inability to deliver renewable energy will increase the cost of renewable energy and electricity to Illinois electric customers.

The Illinois Rivers Project also fosters development of wind within Illinois, since it is a potential transmission facility to which wind farms in Illinois can interconnect. (See id. at 7 and 10). While Wind on the Wires has not prepared an estimate of the potential amount of wind generation that could or would interconnect to the Illinois Rivers Project in Illinois, an indicator of the potential demand for wind farm interconnection within Illinois is MISO's queue of generation facilities that are requesting interconnection to the transmission system MISO manages. Illinois currently has 1,667.7 megawatts of wind in that queue. (See id. at 6).

Since wind energy generated in Missouri, Iowa, and Illinois is eligible for satisfying compliance with the utilities and the ARES RPS, the additional supply will tend to lower the price of renewable energy or RECs that are bought by utilities or ARES in Illinois. As a result, the lower renewable energy and REC prices will lower the cost of compliance with the Illinois RPS.

2. The Illinois Rivers Project Promotes a Competitive Electricity Market in Illinois

There are a handful of studies that demonstrate that the Illinois Rivers Project will promote a competitive electricity market in Illinois. Ameren Transmission performed a study of the line indicating an overall reduction in wholesale market prices. That direct study of the Illinois Rivers Project is supported by the MVP portfolio analysis which shows how the seventeen lines within the MVP portfolio provide a cost savings to Illinois in the range of 1.8:1 to 2.8:1. In addition to those studies, there are publically available reports indicating that both the addition of transmission lines and wind energy provides a hedge against fluctuations in wholesale market prices due to volatility in fuel prices.

Ameren Transmission's study of the Illinois Rivers Projects analyzed the line under a conservative future scenario. That study found that the wholesale energy payment reductions, that would occur if the line were built, were roughly three times larger than the cost of the line. The future scenario Ameren Transmission used in its analysis assumed the continuation of current energy policies with a low demand for electricity by consumers. (See ATXI Exh. 9.0 (2d Rev.) at 15; ATXI Exh. 9.2) Ameren Transmission's analysis forecasts the Illinois Rivers Project will yield a present value reduction in wholesale electric energy payments of \$324.7 million, which is nearly three times larger than the present value cost of the project of \$119.6 million. (Id. at 17-18).

In addition to Ameren Transmission's analysis, MISO evaluated the adjusted production cost benefits of the MVP portfolio of seventeen projects and found that the benefits to cost ratio for Illinois ratepayers would be in the range of 1.8:1 to 2.8:1. In comparison, the range of benefits across the entire MISO footprint was in the range of 1.8:1 to 3.0:1. (WOW Exh. 1.0 at 15 *citing* MISO MVP Report at 50). The adjusted production cost benefits “. . . reflect the savings achieved through the reduction of transmission congestion and through more efficient use of generation resources.” (See id. at 24 and at 15 for a list of the categories of benefits) The adjusted production cost benefits is the summation of six categories of production cost benefits. The savings for those categories are as follows:

Congestion and fuel savings:	\$12.4 billion to	\$40.9 billion
Operating reserves:	\$28 million to	\$87 million
System planning reserve margins:	\$1 billion to	\$5.1 billion
Transmission line losses:	\$111 million to	\$396 million
Wind turbine investment:	\$1.4 billion to	\$2.5 billion
Future transmission investment:	\$226 million to	\$794 million
TOTAL:	\$15.5 billion to	\$49.2 billion

(id. at 15 *citing* MISO MVP Report at 50; WOW Exh. 1.6)

The range of cost savings (*i.e.*, 1.8:1 to 3.0:1) reflects potential changes in key market factors. (See id. at 19) MISO's analysis used four future scenarios. Those scenarios were intended to capture the spectrum of potential changes in the key market factors over the long term. (MISO Exh. 1.0 at 28-29) The lowest potential benefit to Illinois consumers is based on the most conservative future -- Business as Usual Future with low demand for electricity -- and that yielded a benefit to cost ratio of 1.8:1. (See WOW Exh. 1.0 at 15 and 19) The three

remaining futures each yielded greater cost benefits than the 1.8:1. (See id. at 19).

Cost savings similar to what were found in the Ameren Transmission study and the MVP Portfolio study have been found in other transmission studies. A few of those studies include Charles River Associates study of a high-voltage transmission line across Kansas, Oklahoma and Texas¹, the Charles River Associates study of the Green Power Express² and a Synapse Energy Economics study of adding 20 to 40 gigawatts of wind and appurtenant transmission lines to MISO³. Each of these reports finds benefits multiple times larger than the cost. (See id. at 21-23).

¹ CRA International, First Two Loops of SPP EHV Overlay Transmission Expansion: Analysis of Benefits and Costs, (September 26, 2008) *available at* [http://www.crai.com/uploadedFiles/RELATING_MATERIALS/Publications/BC/Energy and Environment/files/Southwest%20Power%20Pool%20Extra-High-Voltage%20Transmission%20Study.pdf](http://www.crai.com/uploadedFiles/RELATING_MATERIALS/Publications/BC/Energy_and_Environment/files/Southwest%20Power%20Pool%20Extra-High-Voltage%20Transmission%20Study.pdf).

² FERC Docket ER09-1431, Protest of NextEra Energy Resources, LLC, Iberdrola Renewables, Inc., Mesa Power Group, LLC, Horizon Wind Energy LLC, Enxco, Inc., Acciona Wind Energy USA LLC, GE Energy, Vestas Americas and the National Resources Defense Council. Affidavit of Robert Stoddard, at 4, *available at* <http://elibrary.ferc.gov/idmws/common/opennat.asp?fileID=12111601>³ Synapse Energy Economics, Inc., The Potential Rate Effects of Wind Energy and Transmission in the Midwest ISO Region, at page 3 (May 22, 2012) <http://cleanenergytransmission.org/wp-content/uploads/2012/05/Full-Report-The-Potential-Rate-Effects-of-Wind-Energy-and-Transmission-in-the-Midwest-ISO-Region.pdf>

³ Synapse Energy Economics, Inc., The Potential Rate Effects of Wind Energy and Transmission in the Midwest ISO Region, at page 3 (May 22, 2012) <http://cleanenergytransmission.org/wp-content/uploads/2012/05/Full-Report-The-Potential-Rate-Effects-of-Wind-Energy-and-Transmission-in-the-Midwest-ISO-Region.pdf>

Another factor to consider is that transmission infrastructure is a powerful tool for increasing competition in wholesale power markets because it reduces the potential for generators to harm consumers by exercising market power. Just as consumers who have access to one local retailer and lack high quality roads to easily access stores in other regions would be at the mercy of the prices charged by that retailer, a weak grid makes it possible for generation owners in constrained sections of the grid to exert market power and charge excessive prices. In any market, the more supply options that are available to an area, the less likely it is that any one of those suppliers will be in a position to exert market power. (See id. at 21).

Both transmission infrastructure and wind generation can improve the competitive electricity market in Illinois by providing a hedge against volatility in wholesale market prices due to volatility in fuel prices. Transmission is an important mechanism to protect consumers against unpredictable volatility in the price of fuels used to produce electricity. Transmission can alleviate the negative impact of fuel price fluctuations on consumers by making it possible to buy power from other regions and move it efficiently across a large region. This increased flexibility helps modulate swings in fuel price by making demand for fuels more responsive to price. Utilities can decrease the use of electricity from more expensive fuel sources when they can respond to price signals. Fluctuations in the price of fossil fuels are likely to continue, particularly if the electric sector becomes more reliant on natural gas. (See WOW Exh. 1.0 at 20). The flexibility to use cheaper fuel sources creates potential savings to electricity consumers.

Wind generation also provides significant hedging value against fuel prices fluctuations. A recent Lawrence Berkeley National Laboratory report concluded that

“Comparing the wind PPA sample to the range of long-term gas price projections reveals that even in today’s low gas price environment, and with the promise of shale gas having driven down future gas price expectations, wind power can still provide long-term protection against many of the higher-priced natural gas scenarios contemplated by the EIA.” (WOW Exh. 1.0 at 20 *citing* Lawrence Berkeley National Laboratory, Revisiting the Long-Term Hedge Value of Wind Power in an Era of Low Natural Gas Prices at i (March 2013) *available at* <http://emp.lbl.gov/sites/all/files/lbnl-6103e.pdf>).

Further support for the price-reducing value of wind energy is the Illinois Power Agency (“IPA”) report on the costs and benefits of renewable resources⁴.

One of the conclusions of the IPA report from 2012 was:

Renewable resources, in particular wind, have played a dramatic role in reducing electric energy prices in Illinois and the entire Eastern Interconnection, as measured by the impact on Locational Marginal Prices (LMPs). Modeling work commissioned by the IPA and corroborated by similar findings in Massachusetts⁵ suggests that for 2011, the integration of renewable resources into the power grid has

⁴ Illinois Power Annual Report: The Costs and Benefits of Renewable Resource Procurement in Illinois Under the Illinois Power Agency and Illinois Public Utilities Acts, (April 2012) (“IPA Report”),

⁵ Recent Electricity Market Reforms in Massachusetts: A Report of Benefits and Costs, at 27-28 (July 2011), *available at* <http://www.mass.gov/eea/docs/doer/publications/electricity-report-jul12-2011.pdf>.

lowered Illinois' average LMPs by \$1.30 per mega-watt hour (MWh), from \$36.40 to \$35.10 per MWh. The aggregate result is a savings of \$176.85 million in total load payment for generation in Illinois. While this does not directly translate to dollar for dollar savings in consumer bills for the same time period, due to the fact that utility consumers are served via a portfolio of resources of different vintage, it points out the magnitude of the benefits accruing to all consumers in lowered underlying electric energy cost drivers. Over time, the effect of lower LMPs due to growing renewable capacity will be reflected in procurement outcomes.” (WOW Exh. 1.0 at 16-17 *citing* IPA Report at 3)(emphasis added).

As demonstrated above, the Illinois Rivers Project improves the competitive electric market within Illinois by providing wholesale electricity cost savings, acting as a hedge to fuel price volatility, and reducing the ability of electricity suppliers to exert market power over electricity prices. The Illinois Rivers Project also fosters the development of wind, inside and around Illinois, which helps foster a competitive electricity market within Illinois by driving down the wholesale market prices of electricity.

3. The Costs and Benefits of the Illinois Rivers Project are Equitably Allocated

The Federal Energy Regulatory Commission requires costs of a transmission facility to be allocated in a way that is “roughly commensurate” with the benefits of a transmission project. In approving MISO’s MVP cost allocation proposal, FERC indicated that it views the benefits of MVP transmission to be broadly and equitably distributed. (See Docket ER-10-1791-000, FERC Order at ¶¶27 and 227 (December 16, 2010), *available at* <http://www.ferc.gov/whats->

[new/comm-meet/2010/121610/E-1.pdf](#).). In evaluating the MVP Portfolio, a key principle of the MISO planning process is that the benefits from a given transmission project must be spread roughly commensurate with its costs – which is intended to reflect the FERC standard. The MVP cost allocation methodology distributes the costs of the portfolio on a load ratio share across the MISO footprint. MISO has the responsibility of demonstrating that the MVP portfolio delivers a similar spread of benefits. (WOW Exh. 1.0 at 28 *citing* MISO MVP Report at 84). Since the cost allocation of this project is under federal jurisdiction, either the issue is moot before the ICC or the ICC should give deference to the FERC’s findings. Since the FERC has found the cost allocation methodology for MVPs (which the Illinois Rivers Project is one) to be distributed across the footprint in a manner roughly commensurate with benefits, we recommend that the ICC find that the cost of the line is equitably distributed among its customers.

In addition to the project benefits being spread roughly commensurate with costs, there are economic development benefits. MISO’s MVP Report estimates that

The recommended MVP portfolio supports the creation of between 17,000 and 39,800 local jobs,⁶ as well as \$1.1 to \$9.2 billion in local investment. This calculation is based upon a creation of \$0.3 to \$1.9 million local investment and 3 to 7 employment years per million of transmission investment. It also assumes that the capital investment for each MVP occurred equally over the 3 years prior to the project's in-service date." (WOW Exh. 1.0 at 30 *citing* MISO MVP Report at 78).

Economic development benefits, typically, are broadly spread around the project area, as indirect economic impacts spread the economic impact beyond local areas and industries that are directly receiving. In addition, the manufacturing jobs associated with building the components of the transmission and wind infrastructure would be broadly distributed around the state as well. The Department of Energy's 2008 report, "20% Wind Energy by 2030," found that the manufacturing jobs associated with deploying large amounts of wind would be broadly distributed across the entire country. (U.S. Department of Energy, 20% Wind Energy by 2030: Increasing Wind Energy's Contribution to U.S. Electricity Supply, at 208 (Appendix C) (2008), *available at* <http://www.20percentwind.org/>).

⁶ MISO notes that its job creation estimates are derived from The Brattle Group, Employment and Economic Benefits of Transmission Infrastructure Investment in the U.S. and Canada, May 2011, page ii, *available at* http://www.wiresgroup.com/images/Brattle-WIRES_Jobs_Study_May2011.pdf.

Thus, the Illinois Rivers Project costs and benefits are broadly and equitable distributed.

III. RECOMMENDED ROUTE OF THE TRANSMISSION LINE

WIND ON THE WIRES WILL NOT BE ADDRESSING THE ISSUES IN
SECTION III.

- A. Introduction**
- B. Mississippi River – Quincy**
- C. Quincy – Meredosia**
- D. Meredosia – Ipava**
- E. Meredosia – Pawnee**
- F. Pawnee – Pana**
- G. Pana – Kansas**
- H. Pana - Mt. Zion**
- I. Mt. Zion – Kansas**
- J. Kansas – Indiana State Line**
- K. Sidney - Rising**

IV. CONCLUSION

Wherefore, Wind on the Wires respectfully requests that the Commission find that the Illinois Rivers Project [1] will promote the development of an

effectively competitive electricity market that operates efficiently, and [2] provides costs and benefits equitable to all customers.

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