

Cardinal- Hickory Creek

TRANSMISSION LINE PROJECT

Oct. 8, 2021

JOINT RESPONSE TO FILING OF MOTION FOR PRELIMINARY INJUNCTION

American Transmission Co., ITC Midwest and Dairyland Power Cooperative

The Cardinal-Hickory Creek Transmission Line Project is vital to the future of our region's renewable energy and clean energy economy. Construction in Iowa has been ongoing since April and American Transmission Co., ITC Midwest and Dairyland Power Cooperative adamantly oppose any efforts to now delay construction. We also believe this project stands on its merits and the court should make the appropriate decision to deny the preliminary injunction.

If granted by the court, a preliminary injunction would cause needless construction delays, postpone the delivery of essential project benefits to electric consumers, and add unnecessary costs to this essential capital project – costs which will ultimately be passed along to energy consumers.

Construction of the Cardinal-Hickory Creek project is well underway, with nearly six months of construction completed in Iowa. The utilities still possess a valid Certificate of Public Convenience and Necessity permit to proceed with construction in Wisconsin and we are prepared to move forward on schedule, as authorized by the Public Service Commission of Wisconsin.

The Cardinal-Hickory Creek project is needed more today than when initially approved by the PSCW in 2019. Currently, there are 58 generation projects, including 55 with nearly 10 gigawatts of renewable generation dependent upon its construction – enough to power seven million homes with clean energy.

The utilities remain on schedule to complete the Cardinal-Hickory Creek line in late 2023. We look forward to completing this project, which will reduce energy costs, improve electric grid reliability, relieve congestion on the transmission system, support decarbonization goals and help support the interconnection of renewable generation in the Upper Midwest.