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October 13, 2025

Lisa Felice
Executive Secretary
Michigan Public Service Commission
7109 West Saginaw Highway
3rd Floor
Lansing, MI 48917

Re: U-21930 - *In the matter, on the Commission's own motion, to commence a proceeding to implement filing guidelines for applications under Act 30 of 1995, as amended.*

Dear Ms. Felice:

Enclosed for electronic filing are Michigan Electric Transmission Company, LLC and International Transmission Company's Comments to Staff's Draft Voluntary Filing Guidelines for Application for Certificates of Public Convenience and Necessity in this matter.

If you have any questions, please contact me.

Sincerely,

Dykema Gossett PLLC

Richard J. Aaron

Enclosure

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**STATE OF MICHIGAN
BEFORE THE MICHIGAN PUBLIC SERVICE COMMISSION**

In the matter, on the Commission's own motion, to)
commence a proceeding to implement filing)
guidelines for applications under Public Act 30 of) Case No. U-21930
1995, as amended.)
_____)

**MICHIGAN ELECTRIC TRANSMISSION COMPANY, LLC AND
INTERNATIONAL TRANSMISSION COMPANY'S COMMENTS TO
STAFF'S DRAFT VOLUNTARY FILING GUIDELINES FOR APPLICATION FOR
CERTIFICATES OF PUBLIC CONVENIENCE AND NECESSITY**

I. INTRODUCTION

Michigan Electric Transmission Company, LLC (“METC”) and International Transmission Company (collectively with METC, “ITC”) appreciate the opportunity to provide comments on the Michigan Public Service Commission (“MPSC” or “Commission”) Staff’s (“Staff”) September 12, 2025 Draft Voluntary Filing Guidelines for Applications for Certificates of Public Convenience and Necessity (the “Draft Guidelines”) pursuant to the Electric Transmission Line Certification Act, 1995 PA 30, as amended (“Act 30”). ITC supports the Commission’s ongoing efforts to improve the filing process for Act 30 applications and commends Staff for its thoughtful work to promote consistency, transparency, and efficiency across proceedings. ITC offers the following comments in the spirit of constructive collaboration, with the goal of ensuring that the filing guidelines effectively serve applicants, stakeholders, and the public interest alike.

ITC fully shares the Commission’s objectives of ensuring a clear, efficient, and transparent Act 30 application process. As a transmission owner with multiple projects recently approved and several additional Act 30 applications anticipated in the near future, ITC recognizes that clear filing requirements and predictable procedures are essential to advancing projects that are vital to Michigan’s energy reliability, economic growth, and grid security and resiliency. Well-defined guidance will help applicants prepare complete records, facilitate Staff review, and support timely Commission decisions—each a critical component of maintaining the pace necessary to meet state and regional transmission needs.

ITC also strongly supports the Commission’s emphasis on meaningful landowner and community engagement as a cornerstone of the Act 30 process. Based on ITC’s

extensive experience, early and transparent communication with landowners results in better routing outcomes, stronger community relationships, and fewer disputes during and after the siting process. ITC's proposed revisions are offered to further these shared objectives while ensuring that the process remains practical, cost-effective, and consistent with statutory requirements. These refinements aim to balance robust engagement and procedural integrity with the need for timely review and decision-making. ITC appreciates the opportunity to participate in this process and looks forward to continued collaboration with the Commission and other stakeholders to finalize balanced, effective filing guidelines that advance Michigan's transmission and reliability goals.

In the sections that follow, ITC provides a brief background on its experience with transmission planning and best practices to offer context for its perspective, followed by a discussion of each proposed filing guideline with specific revisions. These recommendations are intended to help achieve the shared goals of clarity, efficiency, and transparency while ensuring that the process remains workable and aligned with the statutory framework. ITC strongly believes that by doing so, we can collectively achieve the shared goal of routing reasonable and feasible transmission lines that will deliver critical infrastructure to Michigan and the broader region in a timely and effective manner.

II. BACKGROUND

The siting of high-voltage transmission lines is an inherently complex and technical process that requires careful evaluation, extensive coordination, and the application of multidisciplinary expertise. ITC undertakes a rigorous and methodical routing process to ensure that a proposed transmission line can be constructed, operated, and maintained in a manner that serves the public interest while reasonably minimizing impacts to

landowners, communities, and environmental resources. The objective of this process is to identify a route that balances engineering requirements, system reliability, environmental stewardship, and community considerations while still serving the need identified for the project.

To ensure an optimal balance of considerations, ITC undertakes a meticulous route study process guided by a multidisciplinary team comprising engineers, environmental scientists, real estate professionals, and public outreach specialists. Over an extended period (sometimes, months), this team systematically collects, maps, and analyzes a wide range of data, including topography, existing infrastructure corridors, land cover, water resources, habitats of threatened and endangered species, cultural and historical assets, and proximity to residential and certain land uses. The evaluation is further informed by field verification, aerial imagery, and input from regulatory agencies and community stakeholders, all of which contribute to the identification and refinement of viable routing alternatives.

At its earliest stage¹, the process begins by defining a study area and conducting due diligence review to determine constraints. Due diligence at this stage involves not only desktop analysis² of various resources but also outreach to various agencies

¹ This discussion is intended to provide a broad overview applicable to a wide array of projects. For example, projects associated with MISO's Long Range Transmission Plan undergo extensive analysis and strategic planning well in advance of any route studies, including evaluations to identify potential future infrastructure needs on a regional basis. In contrast, while interconnection projects involve a more limited scope of planning, the efforts undertaken remain significant and are tailored to address the specific requirements of each project.

² A desktop analysis leverages publicly available databases and information to remotely evaluate a specific area. Although there may be slight variations between data sources, it is industry standard to utilize a desktop analysis at this stage of route development.

(local, state, and federal) that may have important data in the relevant area as well as field reconnaissance of the study area from public rights-of-way. ITC also collects data from local leaders who offer insights into their communities and anticipated future plans that may be relevant for the routing process. For new projects, ITC has expanded and formalized this approach in local leader listening sessions that take place throughout a project study area. As this information is obtained and reviewed, ITC, with the assistance of its experienced routing consultants and industry experts, develop preliminary route segment networks, seeking to limit impacts by identifying potential routes that attempt to avoid known constraints.

The process of narrowing potential route segments (some projects have thousands of possible segment combinations) into viable transmission routes takes months of data analysis and constraint evaluation. No single factor is determinative; instead, routing consultants and transmission planners strive to balance multiple considerations. These include considerations such as maximizing distance from residences, avoiding dense development, minimizing impacts to environmental features like wetlands, spanning archaeological sites, and aligning with property boundaries where possible. Initial engineering assessments also ensure route options are economically viable and constructible. Based on such factors, routes with relatively high impacts are eliminated.

Route options are then compared using a variety of qualitative and quantitative methods. Through this comparative process, an Act 30 applicant narrows potential routes to those it deems clearly reasonable and feasible for public presentation. At this point in the process, ITC seeks clear, actionable information from landowners. Soliciting specific landowner input before routes are sufficiently vetted and identified can slow progress by

generating information about properties or segments that are unlikely to be proposed and create unnecessary concern among landowners outside the eventual project route. Similarly, soliciting specific landowner feedback too late in the process makes it difficult (or even impossible) to integrate into the application routes before the Commission. Based on ITC's experience, this is a key window for direct landowner feedback.

To capture this valuable feedback on potential routes, ITC will be holding open houses in potentially impacted areas. While outreach has always historically been a part of ITC's transmission planning process, ITC is taking new additional steps to ensure that landowners can provide specific, actionable feedback about their land even earlier in the process. This early engagement is intended to involve the public sooner and to provide ITC with additional data and insights to inform its route studies as it works to narrow potential proposed and alternate routes for future applications. Although this outreach occurs outside of Act 30's requirements, the feedback received will be integrated into the applicable route studies and reflected in the route options that serve as the basis of a construction plan.

Thereafter, the process required under Act 30 begins for gathering public input. Under the statute, public meetings and meetings with chief elected officials of affected municipalities allow ITC to gather further input and refine routes before submitting its application identifying the final proposed route for Commission approval. Indeed, ITC views public engagement and landowner information vital to refining route options into the proposed route that is submitted to the Commission.

Through this exhaustive and iterative process, ITC seeks to identify a route that represents a reasonable and feasible balance among competing considerations and

constraints. ITC's method is designed to be transparent, data-driven, and iterative, recognizing that transmission siting is not simply a matter of drawing a line on a map, but the culmination of months of rigorous study and collaboration with communities and landowners to enable the construction of essential energy infrastructure.

Finally, ITC wishes to provide additional context for its revisions to certain Draft Guidelines related to landowner-requested modifications received during an Act 30 proceeding. ITC notes that these landowner-requested minor adjustments are often most effectively addressed after a certificate is issued, when applicants can work directly with property owners to refine final alignments. Allowing minor modifications—such as pole transitions or centerline shifts within 500 feet of the approved route—provides applicants the flexibility to be responsive to landowner feedback without undermining the integrity of the approved route or restarting the statutory process. This post-certificate approach promotes collaboration, efficiency, and transparency, ensuring that local concerns are meaningfully incorporated while maintaining project momentum and regulatory certainty.

ITC hopes that the foregoing background of its routing approach and related considerations provides helpful context for the comments that follow. With that background in mind, ITC offers the following specific comments on the Draft Guidelines for the Commission's consideration. ITC is also including a redline document (**Exhibit A**) with all of ITC's proposed revisions in a single document.

III. COMMENTS

ITC recognizes that the Guidelines, even upon adoption, will be voluntary in nature and that the Commission's authority is guided by statutory boundaries. ITC, however, offers these detailed comments to support the successful implementation of the

Guidelines from an applicant’s perspective and to affirm our shared commitment to the Commission’s broader policy objectives as related to the Act 30 application process.

A. DEFINITIONS³

Alternate Route(s)

For the second term identified in the Draft Guidelines, ITC assumes Staff intended to elaborate on the meaning of “alternate route(s)” based on its reference to MCL 460.567(2)(c). If so, ITC proposes revising the proposed language to be consistent with Act 30. As drafted, it could be interpreted to bring new meaning to MCL 460.567 by including “route(s) that an. . . **landowner** identifies as an alternate to the applicant’s proposed route[.]” Draft Guidelines, p 3 (emphasis added). Act 30 uses the term “alternate route” only in the context of *an applicant’s application*, requiring “a statement why the proposed route was selected.” MCL 460.567(2)(c). In other words, an “alternate route” is one identified by the applicant itself, for the limited purpose of explaining its chosen route. It is not, and cannot be, a route identified by a landowner or any other party, and the Guidelines should not expand the statutory meaning of the term—instead, such a route identified during a proceeding that would be an “alternative route”. To remain consistent with Act 30, ITC proposes the following revision for “alternate route(s)”:

Alternate route(s): The route(s) that an applicant ~~or landowner~~ identifies **in the applicant’s statement of why** as an alternate ~~to~~ the applicant’s proposed route for the major transmission line **was selected**, as required by MCL 460.567(2)(c) to be included in an application with the Commission.

³ The Draft Guidelines title this section “Definitions.” ITC adopts the same term, recognizing that voluntary guidelines cannot alter Act 30, but rather are intended to clarify the Commission’s interpretation of its filing requirements.

Alternative Route(s)

ITC generally agrees that the Draft Guidelines’ articulation of “alternative route(s)” properly reflects how Act 30 uses the phrase “alternative”—to refer to routes submitted by any party, not just an applicant, for the Commission’s consideration. MCL 460.568(4). The statute further provides that the Commission may approve such an alternative if the presenting party demonstrates, and the Commission determines, that the route is both feasible and reasonable. MCL 460.568(5)(b). ITC, however, proposes a slight modification to the proposed language to ensure it remains fully consistent with the statutory framework:

Alternative route(s): The route(s) ~~or route segment(s)~~ that are submitted by ~~intervening parties~~ **a party to** in the course of ~~the~~ **a contested** case ~~to the Commission~~ that deviate from the ~~proposed~~ route(s) submitted by the applicant with its filing.

Proposed Route

ITC believes that the Draft Guidelines’ description of “proposed route” should be revised, particularly the qualifying language at the end of the definition: “as required by MCL 460.567(2)(b)”, to comport with the statute. A proposed route is the route identified and selected by an applicant for approval in its application. In other words, the proposed route is the route an applicant requests the Commission to review under MCL 460.568(5) and ultimately to identify pursuant to MCL 460.568(6) (“A certificate issued under this section shall identify the major transmission line’s route. . .”). Limiting a proposed route to MCL 460.567(2)(b) is inconsistent with Act 30, as it narrows the statutory framework. ITC therefore proposes the following language:

Proposed route: The route ~~that~~ an applicant identifies **and selects** as the ~~proposed~~ route **to construct for** a ~~for~~ the major transmission line for which a certificate of public convenience

and necessity is requested, ~~as required by MCL 460.567(2)(b).~~

Study Area

The Draft Guidelines define the term “Study Area” as the area an applicant analyzes to determine a proposed and alternate route. In concept, ITC does not oppose including language related to a “Study Area” in the Guidelines. The concern, however, lies in how the Draft Guidelines seek to use the term. Based on the reference to Draft Guideline 2.1, it appears the Study Area is intended to serve as a “notice” area and as the area in which parties may develop and submit alternative routes.⁴ Both applications extend well beyond the intended purpose of a Study Area, which is simply to identify the starting point of a routing study—an area in which only preliminary analysis has been conducted. ITC addresses these concerns with respect to Draft Guidelines 2.1 and 3.1 more fully below. For purposes of the term itself, however, ITC recommends the following revisions:

Study Area: The ~~geographic area~~ **general location** in which the applicant plans to study for the development of a transmission project that includes the geographic area where both ~~the~~ **a** proposed and alternate route(s) are likely to be, however the exact location of the proposed and alternate route(s) is not yet known. ~~The Study Area should, at a minimum, include the area in which municipalities and landowners are required to be noticed as outlined in Guideline 2.1.~~

Other than those identified above, ITC has no additional concerns with the terms under the “Definitions” section in the Draft Guidelines.

⁴ Although not explicitly stated, the area described in Draft Guideline 2.1 is mirrored in Draft Guideline 3.1. ITC interprets this to mean that the Study Area would also serve as the area in which legal notice is given under Draft Guideline 3.1. ITC addresses its concerns with this approach below.

B. CONSTRUCTION PLANS

Draft Guideline 1.1

Act 30 provides clear direction regarding the purpose of a construction plan, the information it must include, how it must be submitted, and who must receive a copy. MCL 460.564. The statute also specifies that any additional information required must “directly relate[] to the construction plan.” *Id.* ITC’s concern with Draft Guideline 1.1 is that certain information Staff recommends be included in a construction plan—including the identification of a Study Area and potential reasons for refining a Study Area as well as the need for the project—appears to expand the statutory requirements of Act 30. This could inadvertently create confusion about the intended scope and purpose of a construction plan under the statute. A construction plan is meant to identify the general location and size of a proposed major transmission line. MCL 460.564(1). It is not intended to serve as a route study or a final, detailed proposed route. While ITC is open to including a Study Area to help describe the general location and size of a proposed line, imposing additional obligations to justify a Study Area or explain changes to it goes beyond what Act 30 contemplates and introduces the potential for unintended consequences.

ITC understands that Staff’s intent with Draft Guideline 1.1(b) may be to provide landowners with context for why a new line is being proposed. As written, however, this language could be interpreted as requiring applicants to demonstrate or prove the “need” for a project—something Act 30 does not require.⁵ Including a brief explanation of why a

⁵ See *In re Application of Michigan Elec Transmission Co*, 309 Mich App 1, 11; 867 NW2d 911 (2014), *aff’d sub nom In re Michigan Elec Transmission Co for Transmission Line*,

proposed line will be constructed within the general location identified in the plan, without converting that explanation into what could be construed as a proof-of-need requirement, would achieve this goal and resolve that concern. ITC’s recommended revision to Draft Guideline 1.1(b) below reflects this clarification.

With respect to subsection 1.1(d), ITC has concerns regarding the requirement to include a list of landowners within a Study Area with a construction plan. Depending on the size and location of the project, a Study Area could encompass thousands—or even tens of thousands—of landowners. A project spanning more than 100 miles of line or intersecting a metropolitan area would make compiling such a list extraordinarily time-consuming and expensive. As an example, ITC estimates that such a list for the project in Case No. U-21471 would encompass roughly 18,000 landowners alone. Independent transmission companies, unlike rate-regulated utilities, do not maintain residential customer lists or landowner contact information. For ITC, which does not have a mailing relationship with end-use customers, compiling this information would require significant resources, including third-party consultants to gather and verify tax records across multiple jurisdictions, often within tight timeframes (such data is not static and would need to be constantly refreshed even if gathered early). This would add substantial cost and delay without providing information that directly relates to the construction plan itself.

Act 30 requires only that a construction plan be submitted to the Commission and that a copy be provided to “each municipality in which construction of the planned major transmission line is intended.” MCL 460.564(1), (2). Any additional information must

500 Mich 988; 894 NW2d 551 (2017) (“MCL 460.568(5) does not specifically state that an applicant for a proposed transmission line must prove that the line is needed.”)

directly relate to the construction plan itself—not to the application process. MCL 460.564(1). For these reasons, ITC respectfully recommends that any landowner-list requirement be omitted to maintain consistency with Act 30 and to avoid unnecessary administrative burdens that could delay critical transmission development.

That said, ITC supports reasonable measures to promote early and transparent communication with landowners. In addition to providing the construction plan to each municipality, ITC maintains a website available to public throughout all Act 30 proceedings that contains its constructions plans, along with a wide variety of other project information. Further, ITC does not oppose including basic guidance in the construction plan regarding how landowners can provide feedback to an applicant. However, as currently drafted, Draft Guideline 1.1(g) could benefit from additional clarity. The references to “details,” “process,” and “property or community characteristics” are somewhat subjective and could be interpreted inconsistently. As an alternative, ITC recommends that applicants include in the construction plan the anticipated dates, times, and locations of public meetings to be held prior to filing an application. This would serve the same purpose—enhancing public awareness and engagement—while remaining fully aligned with Act 30’s statutory framework.

With the above in mind, ITC proposes the following revisions to Draft Guideline 1.1:

Guideline 1.1: As part of the additional information required by the Commission, the applicant must include the following information in its construction plan:

- a. Identification of the proposed Study Area for all major transmission lines to be constructed. ~~A Study Area is normally a regular polygon shape, however if there is an internal portion that an applicant has removed in its initial evaluation due to insurmountable engineering, environmental or social impacts please explain why it was~~

- ~~reasonable to remove this subregion from the final Study Area;~~
- b. The estimated construction year and quarter of all proposed major transmission lines;
 - c. The estimated length of all proposed major transmission lines;
 - d. ~~A statement of the need for all proposed major transmission lines to be constructed;~~ **A brief statement explaining why a proposed major transmission line is to be constructed within the general location identified in the construction plan;**
 - e. A list of all municipalities and landowners, including their addresses, **in which construction of the planned major transmission line is intended and to which the applicant provides a copy of the construction plan,** ~~within the proposed Study Area;~~
 - f. The name, address, telephone number, and email address for a dedicated contact person or persons who have knowledge of the development of the proposed major transmission line and are authorized to communicate on behalf of the electric utility, affiliated transmission company, or independent transmission company; and
 - g. ~~Detail of Act 30's process for soliciting and obtaining information from landowners and municipalities regarding the property or community characteristics in the Study Area that will be used to develop the applicant's proposed route that is to be submitted as part of the applicant's application with the Commission~~ **The anticipated dates, times, and location of all public meetings the applicant intends to hold prior to filing an application.**

C. PUBLIC MEETINGS

Draft Guideline 2.1

Draft Guideline 2.1 recommends for public meetings an applicant “provide notice to all affected landowners and municipalities,” which Staff categorizes into three groups:

- (i) affected landowners and municipalities along the proposed and alternate route(s),

(ii) all landowners and municipalities located within one mile of the proposed route and alternate route(s), and (iii) all landowners and municipalities “within the geographic area between all proposed and alternate routes.” The main goal of this Draft Guideline appears to be expanding public awareness of public meetings. ITC supports this goal but recommends a revised approach to address the two concerns outlined below.

ITC’s first—and most significant—concern is that the current draft refers to an invitation to a public meeting as “notice.” Labeling an invitation as “notice” inadvertently suggests that a failure to receive it constitutes a due-process violation. Publicizing a public meeting under Act 30, however, is distinct from providing legal notice of a contested case proceeding as required by MCL 460.568(1). Act 30 neither mandates notice of public meetings nor authorizes the Commission to impose such a requirement. ITC assumes that Staff’s use of the term “notice” was not intended to create new rights or procedural obligations but rather to encourage broad public engagement for transmission projects. This concern can be readily addressed by revising the draft to use the term “invitation” instead of “notice.”

ITC’s second concern with this proposal is practicality and public safety. Inviting large numbers of landowners who will not be directly affected by a proposed transmission line may inadvertently lead to unnecessary confusion and concern. Landowners located miles away from any potential route could reasonably believe they are impacted, leading to increased opposition and comments unrelated to the project. This could overwhelm public meetings, delay proceedings, and divert focus from those with applicable information.

For example, in developing the Michigan portion of LRTP 2.1 Project 32—which includes an approximately 159-mile Ludington–Copperton 345 kV line, an approximately 40-mile Tittabawassee–Copperton 345 kV line, and an approximately 55-mile Nelson Road–Copperton 345 kV line—Staff’s proposed approach would have ITC to invite not only every landowner along a proposed route but also every landowner within a mile of all proposed and alternate routes and everyone in between those routes. That would amount to hundreds of thousands of invitees, only a small fraction of whom would have relevant information. Processing and verifying such a volume of data would inevitably delay the filing of an application for urgently needed transmission infrastructure, and could significantly increase associated costs to invite such numbers and process such data. Moreover, the proposed approach could create anxiety and confusion for thousands of invitees who will not be affected landowners.

ITC, like Staff, supports broader public awareness of public meetings and intends to expand its invitation area in upcoming Act 30 proceedings to ensure that more landowners are informed of public meetings. Active and meaningful engagement with landowners who may actually be on a proposed route benefits both the applicant and the routing process. While ITC employs routing consultants, conducts extensive desktop analysis, and seeks information from landowners at open houses and municipalities at meetings, it is restricted from accessing private property to assess parcel-specific issues. Landowner engagement is critical to obtain such information. For these reasons, ITC proposes the following revisions to Draft Guideline 2.1 to increase awareness of public meetings while eliminating the concerns noted above:

Guideline 2.1: As part of the public meetings required to by MCL 460.566, Section 6(1) of Act 30, an applicant should

~~invite (i) provide notice to all affected landowners and municipalities through which the proposed major transmission line will pass; and (ii) including all landowners with property located within 500 feet of the centerline of any along any initial proposed and alternate route(s) provided in the construction plan. Additionally an applicant should widely publicize such public meetings utilizing reasonable methods such as geographically appropriate newspapers and social media outlets. Such efforts should endeavor to reach provide notice to all landowners and municipalities with property located within at least 500 feet one-mile of the centerline of the proposed right of way for all initial proposed and alternate route(s) identified in the construction plan for the proposed major transmission line, as well as all landowners and municipalities with property located within the geographic area between all proposed and alternate route(s) identified for the proposed major transmission line.~~

Draft Guideline 2.2

As noted in ITC’s comments on Draft Guideline 2.1, Act 30 does not require legal notice for public meetings, and no such expectation should be introduced through the Guidelines. Requiring verification of delivery of invitations to taxpayers of record— numbering in the hundreds of thousands for large projects—would impose an unwieldy burden while yielding little relevant or useful information. The costs of such an effort (for large projects, the cost could well exceed \$2-3 million) would far outweigh any benefit. It could also create confusion if delivery is simply refused by a landowner. While ITC fully supports broader invitations and meaningful public engagement, expanding these efforts in this manner is unlikely to achieve the intended outcome. ITC therefore recommends deleting this Draft Guideline. As an alternative, ITC would propose the following language to replace the Draft Guideline 2.2:

Guideline 2.2: The invitation to be mailed in accordance with Guideline 2.1 should include the following information:

- a. The date, time, and location of all public meetings the applicant will hold for the proposed major transmission line;
- b. The case number assigned to the proceeding, if available, and a statement regarding the location of case information on the Commission's website;
- c. A link or QR code to the applicant's project website created under Guidelines 2.5; and
- d. The name and contact information for a representative(s) of the applicant knowledgeable about the proposed transmission line and authorized to speak on behalf of applicant.

Draft Guideline 2.3

ITC agrees that engaging the public during the public meeting process and before filing is of utmost importance. ITC has and will continue to take landowner information and proposed refinements to a route option into account before it files its application. ITC has no proposed revisions to Draft Guideline 2.3.

Draft Guideline 2.4

ITC has no issue sharing proposed public meeting materials with Staff prior to public meetings. ITC would only note that public meeting materials are often being finalized until the public meetings begin. To that end, ITC proposes the following revision to Draft Guideline 2.4:

Guideline 2.4: Public meeting materials should be available for Staff review **in substantially final form within** 10 business days prior to the applicant holding the public meetings.

Draft Guideline 2.5

ITC generally has no objection to providing a GIS platform at public meetings or online. In fact, ITC utilized such stations in its last Act 30 cases and expects to expand their use in future projects, as GIS will be a critical component of effective public

engagement. ITC's concern with Draft Guideline 2.5 stems from its linkage between GIS availability and the application filing date, which creates a moving target that is both impractical and unworkable. Once a comment is submitted through GIS, it may take weeks to evaluate. Each submission often requires review by routing consultants, engineers, real estate specialists, and environmental experts—balancing multiple interests in a time-intensive process. For example, METC estimates that evaluating public comments in Case No. U-21471 required more than 40 internal and external personnel and hundreds of collective hours of analysis and discussion. Under the current proposal, leaving GIS open until 30 days before filing would not allow sufficient time for applicants to process and incorporate the information into their applications.

As an alternative, ITC proposes tying GIS availability to the public meeting dates. This approach would ensure that landowners that cannot attend a meeting could still provide comments through the GIS platform, while also allowing applicants adequate time to review, evaluate, and integrate feedback before finalizing a proposed route. For these reasons, ITC proposes the following revision to Draft Guideline 2.5:

Guideline 2.5: An applicant should make available a way for landowners attending a public meeting to identify geographic features of their parcel or add comments, information regarding features of parcels ~~or potential minor route adjustments~~, and any other pertinent information regarding the location of the proposed major transmission line. This information should be translated into a geographic information system (GIS) to be used by the applicant. This could be done by having GIS systems available at the public meetings. A similar map-based interface should be hosted by the applicant on a website available to the public so that **parcel-specific** information ~~and alternate routes~~ may be submitted by those that were unable to attend a public meeting in person. This website should be available **for 14 days after the applicant's final public meeting.** ~~until 30 days prior to the Act 30 application being filed with the Commission.~~

Draft Guideline 2.6

Draft Guideline 2.6 states that applicants should “solicit route modifications, alternate segments, and alternate routes” during public meetings. While ITC fully supports meaningful landowner engagement, it has significant concerns with this Guideline as drafted.

First, Act 30 does not authorize the Commission to prescribe the type of information an applicant must solicit at public meetings.⁶ More importantly, suggesting that applicants should specifically solicit landowner-proposed routes risks mischaracterizing both the purpose of public meetings and the role of landowners in the routing process. Landowner input is an essential component of route development, but such input is typically focused on information related to an individual’s own property. By contrast, as discussed in the Background section, routing specialists rely on extensive expertise, months of analysis, and comprehensive environmental, engineering, real estate, and regulatory data—factors not available to individual landowners. Transmission routing necessarily involves balancing trade-offs among multiple considerations to achieve an outcome that serves the broader public interest.

Suggesting applicants should solicit route modifications or alternate routes from all public meeting attendees may create the impression that every suggested pathway must be fully developed and analyzed. This is neither practical nor accurate. By the time public meetings are held, applicants have already completed extensive analysis to identify

⁶ As discussed further below, treating any landowner suggested route or route segment as an “alternate route(s),” meaning applicants must fully analyze that route or route segment compared to a proposed route and present that to the Commission in an application, is contrary to Act 30. Landowners may, however, present “alternative route(s)” for consideration in a contested case.

proposed and alternate routes, weighing competing considerations in the process. Forcing additional, open-ended solicitation would be unworkable and inconsistent with the purpose of a public meeting, which occurs before a detailed route is finalized.⁷

To be clear, ITC strongly supports receiving specific and detailed landowner feedback during the public meeting process. Indeed, as Staff recognized in Case No. U-21471, ITC made numerous refinements in its most recent Act 30 case in direct response to public comments. Public input is vital to route development—but it must be integrated in a manner consistent with the statutory framework and the practical realities of transmission planning.

Accordingly, ITC proposes the following revisions to Draft Guideline 2.6:

Guideline 2.6: The applicant should ~~solicit~~ **consider as part of its route development for the proposed and alternate route(s) refinements, alterations, changes, or shifts suggested by affected landowners** ~~modifications, alternate segments, and alternate routes for the proposed major transmission line to~~ **the proposed or alternate route(s)** during the public meetings and from the map-based interface website specified in Guideline 2.5.

Draft Guideline 2.7

ITC respectfully requests that this Draft Guideline be removed. While ITC agrees that explaining the factors considered in a route study may be informative, suggesting that applicants share raw routing data at a public meeting is not appropriate. At this stage,

⁷ It is also important to distinguish between pre-certificate route refinements with post-certificate minor-modifications. Pre-certificate, applicants are identifying general route options and incorporating landowner feedback as appropriate and balancing that feedback with a variety of different considerations. Minor modifications—which may include moving poles, shifting lines farther from homes, or addressing landowner-specific concerns—generally occur later in the process, often after permits and approvals are obtained, and an applicant is finalizing design and acquiring land rights.

an applicant may still be collecting or validating data, and even when available, such information is complex and not easily understood without significant context. Routing consultants spend weeks or months analyzing and interpreting this data; attempting to walk through it with landowners in a short public meeting would not be practical or constructive.

Draft Guideline 2.8

ITC agrees that accepting comments through a website can enhance public engagement and provide an important avenue for landowners who cannot attend public meetings. For the reasons outlined above with respect to Draft Guideline 2.5, however, ITC respectfully requests that the online comment window be tied to the public meeting schedule rather than the application filing date. This approach ensures applicants have sufficient time to meaningfully review and incorporate comments. ITC therefore proposes the following revision to Draft Guideline 2.8:

Guideline 2.8: ~~Interested parties~~ **The applicant should be able allow the public** to submit comments and feedback via a website available to the public **from a period starting the day of the applicant’s first public meeting until 14 days after the applicant’s final public meeting. Responses to such comments should be included in the summary required in the application as if the comment were received at a public meeting.** ~~Prior to the filing of the application with the Commission. If the commenter leaves an email address, the applicant should provide a response to that email address.~~

With respect to responding to public comments after public meetings (the last sentence of Draft Guideline 2.8), ITC acknowledges that in some cases a follow-up response may help build public confidence and ensure the public is well informed. ITC proposes adding the following to end of Draft Guideline 2.8:

An applicant should consider directly responding to and/or following-up with public meeting attendees and comments received via a website (described in this Guideline) to the extent such response is requested and practical and if the attendee or commenter provides the applicant with either a phone number, mailing address, or email address when making the public comment.

Draft Guideline 2.9

To comply with MCL 460.567(2)(j), an applicant should maintain records of comments received at a public meeting and responses thereto so that they can be summarized. ITC has no objection to this Draft Guideline, provided it is intended to reflect the statute. If, however, Staff's intent is to impose additional or different requirements, ITC respectfully requests clarification, as such an approach would extend beyond the scope of Act 30.

Draft Guideline 2.10

Under MCL 460.567(2)(j), an applicant must provide a summary of comments received at each public meeting along with its responses. Suggesting that applicants specify whether a request was "granted" or "denied" does not align with either the routing process or Act 30's requirements. At the public meeting stage, routing is still underway, and the purpose of the meeting is to exchange information to enhance a route study or analysis. As the Commission has previously recognized, public meetings are "informational in nature and [are] intended to promote an understanding on the part of the governmental officials, affected landowners, and the general public." May 31, 2007 Order in Case No. U-14867, p 22. In other words, the underlying purpose of the public meeting is for the applicant to share information, not solely for the public to request or advocate for changes to a route.

This Draft Guideline appears to conflate route refinements that may occur during the pre-application stage with minor modifications that typically arise post-approval. Applicants should, of course, consider substantive information from landowners that could affect a proposed route, but inserting a grant/deny standard mischaracterizes the process and risks creating confusion. The statutory requirement—summarizing comments, responses, and the basis for a proposed route—already provides the Commission and the public with a clear record of how input was considered. For these reasons, ITC respectfully requests that this Draft Guideline be removed.

Draft Guideline 2.11

ITC generally agrees that providing the information outlined in Draft Guideline 2.11 is good practice and mostly aligns with what ITC has provided in past public meetings. The only areas of concern are subsections (b), (f), and (g). With respect to need under 2.11(b), ITC’s concerns with this Draft Guideline mirror its concerns explained under Draft Guideline 1.1—that Act 30 does not require an applicant to demonstrate need. Providing general information supporting the need for a project, however, is ordinary course during a public meeting. In addition, land acquisition is not part of the Act 30 process and falls outside the Commission’s jurisdiction. That said, ITC generally agrees it is appropriate to provide landowners with basic information about the acquisition process should approvals be granted. Accordingly, ITC recommends the following revisions to Draft Guideline 2.11:

Guideline 2.11: During all public meetings, the applicant should provide the following information:

- a. ~~Transmission line detail as relates to public health, including any post-construction testing or evaluation (EMF, stray voltage, etc.) presented by a subject~~

~~matter expert who is available to discuss EMF regulations and how the project is designed to meet or exceed those regulations;~~ Information related to the status of research on electric and magnetic fields (EMF) as reviewed by national and international health and scientific organizations, and explain how the project meets public health guidelines (i.e., ICNIRP, 2010; IEEE/ICES, 2019). Information on the electrical effects such as audible noise also should be available;

b. General information supporting the need for the proposed major transmission line~~The need for the line;~~

c. An estimated tax revenue by township due to the project;

d. The construction process and safety measures for the proposed major transmission line;

e. Environmental impact mitigation;

f. General information about land acquisition post-certificate ~~Rights the applicant is seeking from landowners, for example sharing a sample easement;~~

~~g. A high-level overview of the landowner compensation process;~~

g. General information about ~~P~~post construction property restoration procedures and requirements; and

h. The case number of the docket established for the proposed major transmission line, including instructions on how the person can sign up though the Commission's website to receive notifications about the docket.

D. APPLICATION PUBLIC NOTICE

Draft Guideline 3.1

Draft Guideline 3.1 purports to address Act 30's requirement for an applicant to provide "public notice in the manner and form the commission prescribes of an opportunity to comment on the application." MCL 460.568(1). ITC respectfully disagrees

with Staff’s proposal for notice of an Act 30 application in Draft Guideline 3.1. While Act 30 authorizes the Commission to determine the “manner and form” of notice in a contested case, the statute is explicit as to *who* must receive notice: “each affected municipality and each affected landowner on whose property a portion of the proposed transmission line will be constructed.” MCL 460.568(1). The Commission may determine how that notice is provided, but it may not expand the statutory definition of who must be noticed.

Draft Guideline 3.1 extends well beyond Act 30’s requirements and is, in practice, unworkable. Although ITC recognizes the benefit of notifying landowners along an alternate route included in an application, the expansive “notice area” contemplated here would require applicants to send notice to potentially hundreds of thousands of landowners—most of whom would never be affected or even proximate to a potential route. Sending certified mail on that scale would be prohibitively time-consuming and costly (again, likely to exceed \$2-3 million for large projects), with little corresponding benefit. Further, landowners are generally not customers that applicants like ITC already have contact information for and can easily generate a mailing list, which will be constantly changing.

Overly broad notice would also risk significant unintended consequences. Notifying tens of thousands of landowners who are unlikely to be impacted suggests a nonexistent risk of impact, creates confusion about potential routes, and generates unnecessary concern and opposition. It is also likely to substantially increase participation in the contested case from individuals who may never be affected, thereby

expanding discovery and filings and straining already limited resources—the exact opposite intent behind these Guidelines.

By way of example, for a project that spans the Lansing metropolitan area, the notice area suggested in Draft Guideline 3.1 could encompass nearly the entire city of Lansing, East Lansing, Holt, Okemos, DeWitt, Mason, Williamston, and beyond (i.e., a population area of nearly quarter of a million people), which again raises concerns of the practical execution and potential public safety concerns with the execution of public meetings. Similarly, under Draft Guideline 3.1, the notice area suggested by Staff could encompass nearly a third of Michigan’s Lower Peninsula for the Ludington to Copperton project, which stretches more than 150 miles across the state.

ITC appreciates the intent behind expanding notice—to give Staff, intervenors, and the Commission greater ability to present alternatives while avoiding due process issues. However, the confusion, fear, and inefficiencies created by such an expansive approach would outweigh these benefits and would not be consistent with the statute or streamlining the application and discovery process for such cases.

In recognizing the potential benefits of providing notice to a wider audience, ITC proposes a revision to Draft Guideline 3.1 that could result in an applicant voluntarily providing notice to an expanded area while not running afoul of the statutory language. Specifically, ITC proposes that the Guidelines suggest that applicants send notice to affected landowners along the proposed route as well as any alternate route—inclusive of any ROW and area sought for minor modification approval—that an applicant includes in an application. This would align with the approach taken in Case No. U-21471, where METC was directed to notice landowners along both the proposed and

alternate route. ITC is currently considering requesting minor modification authority in future Act 30 cases be up to 500 feet on either side of the centerline.⁸ Under this approach, an applicant would voluntarily notice all parcels within a geographic area that is up to 1000-feet wide for each route included in the application.

With the above in mind, ITC recommends that Draft Guideline 3.1 be revised to read as follows:

Guideline 3.1: The Commission may prescribe the manner in which the public notice of an opportunity to comment on the application is provided. Accordingly, all the following apply:

- a. ~~In addition to complying with MCL 460.568(1), applicants are strongly encouraged to give public notice to any municipality and landowner within 500 feet, or any other distance requested to be included for modification authority in a certificate, on either side of the centerline for the proposed and alternate route(s) included in the application.~~ ~~An applicant should provide public notice to each municipality and landowner with property located along within the proposed and alternate route(s) identified in the application for the proposed major transmission line. Additionally, an applicant should provide public notice to all municipalities and landowners with property located within a one-mile of the centerline of the right of way for all proposed and alternate route(s) identified in the application for the proposed major transmission line. An applicant should also provide public notice to all municipalities and landowners with property located in the geographic area between all proposed and alternate route(s) identified for the proposed major transmission line;~~
In addition to complying with MCL 460.568(1), applicants are strongly encouraged to give public notice to any municipality and landowner within 500 feet, or any other distance requested to be included for modification authority in a certificate, on either side of the centerline for the proposed and alternate route(s) included in the application. An applicant should provide public notice to each municipality and landowner with property located along within the proposed and alternate route(s) identified in the application for the proposed major transmission line. Additionally, an applicant should provide public notice to all municipalities and landowners with property located within a one-mile of the centerline of the right of way for all proposed and alternate route(s) identified in the application for the proposed major transmission line. An applicant should also provide public notice to all municipalities and landowners with property located in the geographic area between all proposed and alternate route(s) identified for the proposed major transmission line;
- b. Public notice should be in the form of a certified letter **with delivery tracking** to the taxpayer of record of the affected property **identified in Guideline 3.1(a)** and should include the following:

⁸ ITC studied as part its environmental review in Case Nos. U-21471 and U-21472, 250 feet on either side of the centerline, and requested minor modification authority for the same. ITC's current plan would double, at minimum, the area studied—and therefore noticed—by an applicant under this approach.

- i. The case number of the docket established for the proposed major transmission line, including instructions on how the person can sign up through the Commission's website to receive notifications about the docket;
- ii. A highlighted map of the ~~initial~~ proposed and alternate route(s) identified in the application;
- ~~iii. If the line is more than five miles in length, a highlighted map of the geographic area within a one-mile radius of the proposed and alternate routes, as well as the land between them;~~
- iii. The name, address, telephone number and email address for a dedicated contact person or persons who have knowledge of the development of the proposed major transmission line and are authorized to communicate on behalf of the applicant;
- ~~v. Detail regarding the type of information the applicant is seeking from the noticed landowner, such as:
 - 1. Particular characteristics about the landowner's property;
 - 2. Land use; and
 - 3. Features of historical or environmental significance.~~
- iv. Rights the applicant is potentially seeking from the noticed landowner.

As can be seen above, ITC also proposes eliminating Draft Guideline 3.1(b)(v). Once an application for a certificate of public convenience and necessity is filed, the applicant is no longer soliciting information regarding the application's proposed and alternate route(s).⁹ At that point, the routing process is complete for purposes of the statute, and Act 30 limits certain activities after filing. If a proposed route is altered post-filing, the application must be amended to reflect the change, which could require a

⁹ Landowner feedback will again be solicited after an Act 30 proceeding for the purposes of making minor modifications and determining final design.

new environmental report and risks restarting the statutory clock—which would necessarily delay the project’s construction.

The statute instead contemplates that parties to the case may propose alternative routes. Any such party bears the burden of demonstrating that its proposal is reasonable and feasible. The applicant’s proposed route—the basis of the application—cannot be changed without amendment. To the extent landowners wish to provide additional input once an application is filed, they may intervene in the contested case, submit public comments to the docket, or offer comments at a Commission meeting. These avenues for involvement already exist under the statutory framework, as seen in Case No. U-21471.

Draft Guideline 3.2

Draft Guideline 3.2 seeks to address an issue identified in Case No. U-21471: when an intervening party proposes an alternative route that deviates significantly from the applicant’s proposed route, the landowners impacted by that alternative may not have received actual notice under MCL 460.568(1). This creates due process concerns and limits the Commission’s ability to consider such alternatives. While legal notice requirements inherently restrict the scope of possible alternatives, this is a reality of the transmission siting process and the structure of Act 30.

Staff proposes to resolve this by: (1) defining the area within which intervenors may present alternatives and (2) suggesting applicants to send notice to landowners impacted by an intervenor’s alternative, informing them of the case and their ability to intervene.

ITC supports Staff's first proposal to define the area in which intervenors can present alternatives. Doing so provides clarity and sets reasonable expectations for parties regarding routing options that could realistically be approved under MCL 460.568(5)(b). ITC recommends that Draft Guideline 3.2 simply state an alternative route should only include property that received notice in accordance with Draft Guideline 3.1 as revised above.

ITC respectfully disagrees, however, with Staff's second proposal suggesting that applicants to send notice to landowners impacted by intervenor-proposed alternatives. Act 30 requires applicants to notify only landowners along the applicant's proposed route. MCL 460.568(1). Nothing in the statute authorizes the Commission to require applicants to issue new notice mid-case for routes proposed by others. Beyond the legal concerns, such a Guideline would be prejudicial as it would have applicants notify landowners about how they might seek late intervention, effectively positioning applicants against their own due process interests.

It also defeats the fundamental purpose of providing notice at the outset of a case, which is to ensure that all affected parties are aware of the proceeding before it begins and can participate on equal footing. Suggesting there should be additional rounds of notice in the middle of a contested case would undermine that principle, create confusion about who is properly a party, and generate significant uncertainty for applicants and intervenors alike. From a practical perspective, midstream notice obligations could also cause substantial delays in proceedings, with ripple effects for project schedules, statutory deadlines, and the Commission's ability to resolve cases efficiently. For these reasons, ITC recommends removing this portion of Draft Guideline 3.2.

Guideline 3.2: MCL 460.568, Section 8(4) of Act 30 permits a party to a contested case proceeding established for the proposed major transmission line to submit alternative routes or route segments. Any alternative route or route segment proposed **presented** by a party to the contested case proceeding **may only traverse property which received notice in accordance with Guideline 3.1.** ~~should be confined to the notice area from those noticed in Guideline 3.1 and should be proposed before cross examination occurs in the contested case proceeding. Upon receipt of a proposed alternative route or route segment, the applicant should provide notice to all landowners with property located on the newly proposed alternative route or route segment. The letter should include notice that the landowner is now located on a proposed alternative route and should include information on how the affected landowner can seek intervention in the contested case proceeding.~~

E. APPLICATION MATERIALS

Draft Guideline 4.1

Draft Guideline 4.1 states that applicants should provide Staff with all landowner comments received at public meetings, all route refinements submitted by affected landowners, and the applicant's response to each. Staff indicates a preference that this information be provided via SharePoint.

Act 30 expressly requires that an application include a *summary* of public comments. MCL 460.567(2)(j). Given that an applicant may receive hundreds of comments, many of which are parcel-specific, the Legislature determined that a summary was sufficient for Commission review. Suggesting that submission of every individual comment and response be submitted to the Commission would go beyond the statute and conflict with its plain language. For this reason, ITC respectfully recommends that Draft Guideline 4.1 be removed.

That said, ITC agrees with Staff that guidance related to a public comment summary would ensure Staff has the information they need from the onset of a proceeding

as well as set expectations for applicants when preparing a summary. As an alternative to providing each public comment, ITC proposes the language below for the Commission's consideration. The intent is to address Staff's main concern in Case No. U-21471 in that the public comment summary included only "generalized remarks." See Case No. U-21471, Dkt. No. 21471-0278, Staff's Initial Brief, p 40.

ITC urges the Commission to maintain Act 30's explicit requirement of a *summary* of public comments and responses thereto. To eliminate the likely discovery request from Staff for any public comments received during public meetings, however, ITC suggests encouraging applicants to make available all comments received at public meetings or through the GIS system to Staff simultaneously with its application, which serve as the basis for the public comment summary. This would help eliminate a likely discovery request but does not expand the statutory requirement on this topic. For these reasons, ITC suggests replacing Draft Guideline 4.1 with the following language:

Guideline 4.1: An applicant's public comment summary should clearly identify the main topics or concerns raised at each public meeting in each municipality. A summary may include a statement related to the frequency in which the topic or concern was raised. Example comments may be helpful in explaining the topic or concern. The public comment summary should include detailed, proportionate responses to each topic and concern summarized, including acknowledgment of the comments and a concise explanation of how the applicant considered, evaluated, or addressed the topic or concern. Copies of all public comments received by an applicant from a public meeting or from the GIS system as outlined in Guideline 2.5 should be made available to Staff electronically simultaneously when the application is filed.

Draft Guideline 4.2

ITC proposes two revisions to Draft Guideline 4.2. First, the phrase “public meeting notice” should be replaced to “public meeting invitation,” for reasons discussed above in response to Draft Guideline 2.1. Second, ITC requests that “application public notice” be removed from the guideline. Applicants do not mail public notice prior to filing an application. Public notice of an application is provided at the direction of the Commission’s Executive Secretary and after a prehearing has been scheduled. Applicants typically file affidavits and proofs of service indicating that the applicant has complied with notice requirements. The Guidelines should not depart from this established practice. For these reasons, ITC recommends the following revision to Draft Guideline 4.2.

Guideline 4.2: As part of its application for the proposed major transmission line, the applicant should provide detail about how the applicant complied with all requirements outlined in Act 30 and in these guidelines for the construction plan, public meeting **invitation** ~~notice~~, public meetings, ~~application public notice~~, and application materials.

Draft Guideline 4.3

Draft Guideline 4.3 requests that an applicant explain how the Study Area was determined, including the methodology used to identify areas deemed “unreasonable and/or unfeasible.” Presumably, this Draft Guideline is intended to capture any changes to the Study Area between the construction plan and the application. Because Staff’s proposal uses the Study Area both to define the notice area and to establish where intervenors may propose alternatives, this provision appears designed to discourage applicants from narrowing the Study Area to avoid the burdens of broad notice suggested in the Draft Guidelines. ITC respectfully disagrees with this approach, as discussed at

length above. In light of ITC’s proposed revisions to Draft Guidelines 2.1 and 3.1, ITC recommends that Draft Guideline 4.3 be removed.

At a minimum, however, if the Commission decides to maintain Draft Guideline 4.3, ITC recommends the revision below. As demonstrated in Case Nos. U-21471 and U-21472, route studies generally include a discussion of the Study Area and how it was determined. Including Draft Guideline 4.3 in that narrower form would remain consistent with evidentiary presentations in prior Act 30 proceedings.

Guideline 4.3: The applicant should include a discussion of how the applicant determined the Study Area. ~~Any areas that are not considered because they were not reasonable and/or feasible should be discussed along with the methodology that determined them to be unreasonable and/or unfeasible.~~

Draft Guideline 4.4

The second sentence of Draft Guideline 4.4 is duplicative of Draft Guideline 4.5 and should be removed. With respect to the first sentence, the meaning of “utility alternate route” is unclear. Based on context, ITC understands this term to mean “applicant alternate route,” and therefore reads this proposal as encouraging applicants to present more than one alternate. If this interpretation is correct, ITC does not object to the first sentence but proposes removing the word “utility” for clarity. ITC’s proposed revision assumes that the definition of “alternate route(s)” outlined above in the Definitions section is also adopted.¹⁰

Guideline 4.4: The applicant is encouraged, in addition to the proposed route, to identify and assess more than one utility alternate route for the proposed major transmission line in the application submitted to the Commission. ~~In addition, the~~

¹⁰ Should the Commission adopt a different definition such that “alternate route(s)” means a route identified by someone other than the applicant, ITC proposes replacing the word “utility” with “applicant” before “alternate route.”

~~applicant should include all landowner alternate routes and alternate route segments proposed by any landowner as one of the alternate routes for the proposed major transmission line, complete with the applicant's assessment of those alternate routes and route segments using the applicants identified evaluations factors.~~

Draft Guideline 4.5

As part of an application, an applicant must include “[a] description and evaluation of 1 or more alternate major transmission line routes and a statement of why the proposed route was selected.” MCL 460.567(2)(b). Draft Guideline 4.5 would expand this requirement by treating *any* landowner-suggested route or route segment as an alternate route under MCL 460.567(2)(c), “complete with the applicant’s assessment of those alternate routes and route segments using the applicant’s identified evaluation factors.” Draft Guidelines, p 11.

In practice, applicants already conduct a detailed analysis comparing the proposed route to an alternate, as reflected in Case No. U-21471 where METC’s Route Studies included entire sections evaluating alternate routes for each project. Draft Guideline 4.5 would have an applicant conduct the same detailed analysis for potentially hundreds of landowner “alternate routes,” which is unreasonable. And while Act 30 contemplates that an applicant could consider more than one alternate route in its application, it does not give the Commission authority to dictate *what* alternate route or routes must be considered, i.e., a landowner identified route.¹¹

¹¹ It also contains no qualifying language for obviously unreasonable or infeasible alternate requests. Landowners may not understand that paralleling certain infrastructure or adding miles to a design to avoid all of that landowner’s property (or an entire municipality) may simply be an exercise in futility. Routing transmission lines is a specialized, multidisciplinary exercise, much more than drawing a line on a map.

Indeed, Draft Guideline 4.5 expands the definition of “alternate route.” Act 30 contemplates alternates identified by the applicant to assist in selecting the proposed route—routes that could reasonably have been chosen instead. This selection is accomplished through months or years of analysis and data review by a variety of subject matter experts.

Even more concerning but less obvious is that Draft Guideline 4.5 will undermine an applicant’s professional judgment of methodically identifying a proposed route through developing a study area, identifying and analyzing resources within the study area, soliciting feedback from agencies and the public, evaluating route segments, and refining potential route options. If an application treated every landowner-suggested route as an alternate, it effectively negates the iterative process of conducting a route study to weed out less favorable route options because every single landowner suggestion would necessitate detailed and individualized environmental reviews, engineering assessments, and related analyses, so that each can be compared to the proposed route. ITC does not oppose presenting more than one alternate route when appropriate for a given project. Act 30 allows such flexibility, leaving the decision to the applicant and its routing experts.

As an alternative solution, ITC proposes a revised guideline that addresses a concern expressed by Staff in Case No. U-21471 related to the route refinement process. Specifically, Staff indicated that it is important for the public to understand if there are any changes to a route as a result of public meetings and specific landowner comments. ITC generally agrees with Staff’s goal to promote transparency and understanding to how public comments influence route selection. Rather than present each landowner suggested route refinement as an alternate route, ITC proposes that applicants consider

including in their application information regarding the route refinements process and the changes made by applicants between a construction plan and an application.¹² As part of that explanation, an applicant could specifically identify the public comments or stakeholder feedback that influenced the alignment of the proposed route presented in the application. This approach also better aligns with routing best practices. Changes or adjustments to a route are generally not motivated by just one factor, such as a single public comment. Indeed, the goal of routing generally is not only to consider public feedback but to balance public feedback with other routing factors, including environmental, engineering, cost, and design considerations. For these reasons, ITC suggests replacing Draft Guideline 4.5 with the following language:

Guideline 4.5: An application should identify all route refinements, adjustments, changes, or shifts made to a route between a construction plan and the alignment of the proposed route as presented in the application, if applicable. For each refinement, the applicant should identify the data, factors, and considerations that explain the alignment of the proposed route as presented in the application, including whether the refinement, adjustment, change, or shift was influenced by stakeholder or public input.

Draft Guideline 4.6

Draft Guideline 4.6 asks an applicant to include Google Earth maps of the proposed and alternate route(s) in its application for Staff and intervenors to review. The draft language also identifies six items that should also be included with the maps of the proposed and alternate route(s). ITC does not take issue with, generally, providing

¹² To provide clarity to ITC’s intent, ITC proposes that an application include information similar to that included in Exhibits S-4.13 through S-4.24, S-4.31 through S-4.37 in Case No. U-21471.

electronic maps of the proposed and alternate route(s), but proposes revisions and requests clarification as to what Staff would like the maps to include.

- Draft Guideline 4.6(a) suggests identification of “any existing electrical utility easements” be included on the map. Although an applicant can identify easements in its possession, applicants may not know or reasonably identify existing utility easements owned by another transmission company or utility.
- Draft Guideline 4.6(b) suggests inclusion of the “geological composition and soil type;” however, it is unclear what information it is requesting.
- Draft Guideline 4.6(d) suggests the map include a layer for “endangered wildlife habitat or wildlife refuge,” which ITC requests to be further defined to ensure the intent and desired information.
- Draft Guideline 4.6(e) suggests the map include identification of dwellings within the right-of-way. Although ITC agrees that this information may be helpful, an application like Google Earth will already include that information within the program. ITC proposes that (e) be replaced by a suggestion that the right-of-way be highlighted or included with a depiction of the centerline of the proposed and alternate route(s).
- Draft Guideline 4.6(f), which asks for identification of “any obstacle that was deliberately avoided,” is vague and undefined. Even with additional clarity, a discussion of resources, areas, or items that are “deliberately avoided” is likely included in the discussion of a route study. This requirement is therefore repetitive and not needed.

For all of the above reasons, ITC proposes the following revisions to Draft Guideline 4.6:

Guideline 4.6: The application should include **electronic** maps of all proposed and alternate routes in **KML or KMZ format** ~~a google earth format~~ for easy use by Staff and intervenors. These maps should include the following:

- a. Parcels crossed as well as any existing electrical utility easements on the parcel, **if known to the applicant;**
- b. Geological composition and soil type within the area of notice described in Guideline 3.1;
- c. Labeling of route segments;
- d. Any known endangered wildlife habitat or wildlife refuge; **and**
- e. ~~Any known dwelling within~~ **Depiction of the requested** right of way (ROW); ~~and~~
- f. ~~Any obstacle that was deliberately avoided through development of the proposed and alternate route(s).~~

Draft Guideline 4.7

Draft Guideline 4.7 includes information related to the engineering specifications of a proposed transmission line, including the type of equipment, structures, and voltage rating. ITC does not oppose this language, but ITC proposes the below revisions to provide clarity and ensure consistency with industry and technical standards.

Guideline 4.7: The application should include pertinent engineering information regarding the transmission equipment, including but not limited to:

- a. Discussion of reasons that the equipment is above ground or below ground;
- b. Designed voltage rating;
- c. Operation voltage rating;
- d. If the transmission equipment is above ground:

- i. ~~Conductor size and type of structures;~~ Type of structures, conductor size, and minimum midspan clearance above ground at peak loading;
 - ii. Height of typical structures;
 - iii. Explanation of why these structures were selected; and
 - iv. Dimensional drawing of typical structures to be used in the project.
- e. If the transmission equipment is below ground or underwater:
- i. Burial depth;
 - ii. Type of cable and a description of any required supporting equipment, such as insulation medium pressurizing ~~or forced cooling~~;
 - iii. ~~Cathodic protection scheme; and~~
 - iii. Type of dielectric fluid and safeguards used to limit potential spills in waterways, **if applicable;**
 - iv. **Horizontal and vertical clearances from adjacent utilities;**
 - v. **Dimensional drawing of typical structures to be used in the project such as cable vaults; and**
 - vi. **Required maintenance easements.**

Draft Guideline 4.8

Draft Guideline 4.8 outlines expectations for providing route analysis data with an application. In short, it requests all raw evaluation factors and quantitative data used to develop candidate routes, as well as the information used to narrow those routes to a proposed and alternate. It also seeks disclosure of “formal and informal weighting factors” used to score routes, detailed environmental analysis data such as LiDAR scans, and an explanation of the data sources used in the route study. In principle, ITC does not oppose

providing routing data with an application. However, several aspects of Draft Guideline 4.8 require clarification with respect to each of its subparagraphs.

Under Draft Guideline 4.8(a), ITC interprets the request as calling for a data table similar to that provided in METC’s route study in Case No. U-21471, with the additional suggestion that the data be submitted in Excel as well as PDF. If that is the intent, ITC agrees that providing this format could assist Staff’s review and reduce the need for discovery. However, ITC is concerned with the final phrase—“to assist with evaluation of intervenor-suggested alternatives.” This language should be removed, as it creates the misleading impression that a route study, completed before interventions occur, must anticipate or be amended to address intervenor proposals. The burden of presenting and supporting an intervenor-proposed alternative rests with the intervenor, not the applicant. While Staff or intervenors may reference an applicant’s data in developing alternatives, applicants should not be responsible for other parties’ evidentiary presentations or required to create work product on their behalf.

With respect to Draft Guideline 4.8(b), the phrase “quantitative analysis” is unclear. Based on its experience, ITC assumes it refers to data normalization or form of scoring that was conducted during a route study. ITC does not object to providing this information, but requests clarification that the Guideline does not mandate any specific type of analysis. If Staff intends to require a particular methodology, that should be explicitly stated. In ITC’s view, such decisions should remain with the applicant, guided by professional expertise and experience. There are many valid approaches to route evaluation, and no single method is universally preferable.

Regarding Draft Guideline 4.8(c), ITC reiterates that the language should not create an expectation that applicants assign weights to evaluation factors. The term “informal weighting” is particularly vague and could be interpreted to include professional judgment or applicant preferences. For clarity and simplicity, this phrasing should be removed.

Finally, ITC recommends removing Draft Guideline 4.8(d). It is unclear what data Staff is intending to cover that would be beyond 4.8(a). For all of the above reasons, ITC proposes the following revisions to Draft Guideline 4.8:

Guideline 4.8: The application should include route and segment scoring data. This includes the following:

- a. Raw evaluation factors and any quantitative data used to evaluate potential routes from a routing study or similar development of candidate routes presented in an excel format with any equations intact. Raw evaluation factors should be presented on a route basis ~~as well as per routing section basis to assist with evaluation of intervenor-suggested alternatives;~~
- b. Any quantitative analysis done on evaluation factors or quantitative data used to evaluate potential routes that resulted in narrowing of potential routes considered. This includes selection of the proposed and alternate routes;
- c. Any formal ~~or informal~~ weighting factors that the applicant used in the scoring of the potential routes, if used, and how these weighting factors affected the selection of proposed and alternate routes;
- d. ~~Evaluation factor data from the proposed and alternate routes as filed after refinement and increased data granularity is available from environmental impact study, LiDAR scans, etc., presented in excel format with any equations intact;~~ and
- d. Data sources for final evaluation factors. If the applicant utilized multiple sources for a single evaluation factor in finalized data, explain how these were incorporated with one another.

Draft Guideline 4.9

ITC does not object to identifying specific and uniform routing factors for use in a route study so long as all recognize that these factors may not be applicable across every project. Several factors in Draft Guideline 4.9, however, are unclear or require further definition to ensure they can be consistently applied, including:

- Length of line replacing existing transmission
- Military installations
- Municipal boundaries

In addition, for the social data factors (i) through (vi), the draft language does not clarify what “within 500 ft” refers to—whether from the ROW or from the centerline. ITC recommends revising these factors to specify “within 500 feet of proposed centerline” for consistency.

Aside from the suggested revisions, ITC opposes inclusion of a visibility score as a routing factor or scoring criteria. Visibility scores are a subjective and descriptive metric and difficult to consistently quantify without additional guidance. ITC is concerned that visibility scoring may unintentionally create bias towards specific routes or outcomes irrespective of the overall impacts. A route’s score may be influenced by stakeholder opinions based on aesthetics rather than data. Additionally, in ITC’s experience, visual impacts may change significantly as a project develops, even after a route is approved, because it is often impacted by changes in design, engineering, and final construction.

Finally, ITC proposes adding a qualifier to Draft Guideline 4.9 recognizing that not all factors may be relevant or practical for every project. In such cases, an applicant’s routing experts should be permitted to exercise professional judgment to modify or exclude factors, with a brief explanation provided in testimony or exhibits.

This clarification would avoid unnecessary disputes over factors with little or no bearing on the overall reasonableness and feasibility of a route or the sufficiency of a route study.

Guideline 4.9: Applicants should address each of the factors listed below to the extent relevant and practical for the specific project. In instances where a factor is not applicable or cannot reasonably be evaluated, the applicant's routing experts may exercise professional judgment to modify or exclude such factor, with a brief explanation provided in testimony or exhibits. Route and segment scoring data should include at least the following:

a. Engineering data

- i. Length
- ii. Number of angles greater than 30 degrees
- iii. Road/railroad crossings
- iv. Transmission line crossings
- v. Length replacing existing transmission line
- vi. Paralleling to existing linear features, including but not limited to:
 1. Existing transmission line
 2. Public road or highway
 3. Recreational trails
 4. Existing pipelines
 5. Property or section lines
 6. Existing railroad or railroad rights of way

vii. Land use

1. Greenfield
2. Extraction
3. Military installation
4. Animal feeding operations
5. Farmland
6. Center pivot irrigation within the proposed ROW
7. Solar Farms within 500 feet of the proposed centerline
8. Wind Turbines within 500 feet of the proposed centerline

b. Environmental data

1. Wetland within ROW
2. Hydric soil within ROW
3. Rivers/streams/waterways crossed

4. Woodland within ROW
5. Grassland/Pasture within ROW
6. Threatened and Endangered Species Critical Habitat
7. National wildlife refuges

c. Social data

- i. Historic sites within 500 feet of the proposed centerline
- ii. Schools within 500 feet of the proposed centerline
- iii. Places of worship within 500 feet of the proposed centerline
- iv. Hospitals and nursing homes within 500 feet of the proposed centerline
- v. Memorial parks/cemeteries within 500 feet of the proposed centerline
- vi. National Landmarks/monuments within 500 feet of the proposed centerline
- vii. Airport obstacle free zones
- viii. VHF Omnidirectional Range and Tactical Air Navigation (VORTAC) sites
- ix. Archeological sites within the proposed ROW
- x. Total area of the proposed new ROW required
- xi. Number of parcels within the proposed ROW
- xii. Residences
 1. Within 100 feet of the proposed centerline
 2. Within 101-300 feet of the proposed centerline
 3. Within 301-500 feet of the proposed centerline
- xiii. Buildings
 1. Within 100 feet of the proposed centerline
 2. Within 101-300 feet of the proposed centerline
 3. Within 301-500 feet of the proposed centerline
- xiv. Public facilities
 1. Within 100 feet of the proposed centerline
 2. Within 101-300 feet of the proposed centerline
 3. Within 301-500 feet of the proposed centerline
- xv. Municipal boundaries
- xvi. Public lands
- xvii. ~~Visibility score~~

Draft Guideline 4.10

Draft Guideline 4.10 would require an application to explain any overlap between the proposed and alternate routes. ITC respectfully requests that this Draft Guideline be removed. In Case No. U-21471, the Commission found that “good reasons exist for not requiring an alternate route and a proposed route to be entirely separate[,]” and further noted that Act 30 “is completely devoid of any limitation on the amount of overlap the routes may possess.” July 10, 2025 Order in Case No. U-21471, p 52. As METC’s expert witnesses explained in that case, limiting overlap ignores the realities of transmission routing and undermines the purpose of a comprehensive route study. Depending on the length, geography, and design of a project, restricting overlap could reduce the availability of viable alternatives and increase project impacts. If adopted, Draft Guideline 4.10 would likely be the first of its kind as the Commission acknowledged that “it is unaware of any jurisdiction that places a fixed, upper limit on the amount of overlap that may be permitted between a proposed and alternate route.” *Id.*

Draft Guideline 4.11

Draft Guideline 4.11 suggests an applicant identify the “existing lines that will be tied into” a new substation, include a line diagram of how the substation will be connected to the existing system, and an explanation of how the filing entity plans on rerouting existing lines into the new substation. Existing lines tied into substation and plans for rerouting existing lines to a new substation is outside the Commission’s jurisdiction unless such requests are included in an application. This information is not tied to any of the application information nor is it related to the factors under MCL 460.568. The general location of the substation may be relevant (as part of the route(s) and the construction

plan) but the engineering related to the substation and other existing transmission facilities is not. Also, many of the final, detailed plans related to how exactly a substation will be integrated into the existing system are not known until the final route is approved. If an alternative route is approved by the Commission, for example, an applicant may need to shift its approach into a substation. ITC proposes the following revisions to Draft Guideline 4.11, if adopted by the Commission:

- Guideline 4.11:** If the application includes new substations, the following information should be provided:
- a. ~~A general explanation of how the existing transmission system will be integrated into the new substation~~ Existing lines that will be tied into the new substation; and
 - b. ~~If an application includes a request for approval for existing lines to connect into the new substation,~~ A line diagram of how the substation will be connected to the existing system; and
 - c. ~~Explanation of how the filing entity plans on rerouting existing lines into new substation.~~

Draft Guideline 4.12

An application must include the “[e]stimated private benefits of the proposed major transmission line to the applicant or any legal entity that is affiliated with the applicant.” MCL 460.567(2)(h). In Case No. U-21471, the Commission determined that an estimate of profits METC expects to earn based on information available at the time and provided in discovery was adequate. See Case No. U-21471 Order, p. 54. ITC interprets Draft Guideline 4.12 to reflect that finding and does not propose any revisions.

Draft Guideline 4.13

Draft Guideline 4.13 requests an application include “projected tax revenue” that would be due to a township from construction and maintenance of a project. It is not clear what information is requested through this Draft Guideline. Generally, there is not specific tax revenue for townships for construction of a transmission line. And applicants likely

will not pay property taxes, which may be another source of revenue the Draft Guidelines assume would be a benefit of a transmission project. That said, ITC agrees that information regarding local public benefits is relevant to the Commission’s assessment of a proposed transmission line. ITC proposes the below revisions to Draft Guideline 4.13:

Guideline 4.13: Under public benefits, the applicant should, ~~to the extent applicable to the proposed transmission line,~~ include ~~projected tax revenue by township estimates regarding the local economic investment, job creation, and potential local tax revenue~~ due to the construction and maintenance of the project.

Draft Guideline 4.14

ITC generally does not take issue with including information regarding the needed right-of-way width in an application. However, as phrased in the Draft Guidelines, the information required is not a practical way to describe how the appropriate right-of-way is determined. NERC does not set forth quantitative standards or requirements for right-of-way width. Rather, NERC establishes performance standards and applicants determine the right-of-way needed to meet those standards. A project’s right-of-way width may also be influenced by other industry standards, such as the National Electrical Safety Code Standards (“NESC”). To reflect industry practices more accurately, ITC proposes the following revisions:

Guideline 4.14: The applicant should provide the following information regarding its proposed right of way:

- a. ~~Justification~~ **Explanation that** for the proposed width of the right of way **aligns with,** ~~including a quantitative analysis that is based on~~ North American Electric Reliability Corporation (NERC), **National Electrical Safety Code Standards (NESC), or other relevant industry standards, as applicable, and related documentation or analysis.** ~~requirements where the end result of the quantitative analysis is width of ROW; and~~

b. ~~Consideration taken for proximity to dwellings.~~

Draft Guideline 4.15

Draft Guideline 4.15 outlines information to be included in an application related to public health and safety, as required by MCL 460.567(2)(i). The proposed revisions below are intended to provide clarity to the information identified by the draft language. As a global comment, ITC takes issue with the phrasing “any public health impacts of the project including EMF” because it would improperly suggest that EMFs are a public health concern, which is not accurate. Still, ITC agrees that calculating EMFs and demonstrating compliance with industry standards is a relevant public health and safety consideration.

To reflect this fact more accurately, ITC proposes the following revisions:

Guideline 4.15: ~~The applicant should provide detail about potential public health and safety topics related to a proposed transmission line, including the following: EMF, Stray Voltage, and Public Health:~~

- ~~a. Provide detail about how the applicant has minimized any potential health impacts of the project including EMF, audible noise along with the audible noise what threshold that the transmission line is being built to, and fire risk should be presented with the application;~~
- a. Calculate **resultant power-system frequency** magnetic and electrical fields (**EMF**) at the edge of the ROW and ~~in~~ **at** the ~~centerline~~ **edge** of the ROW, **at 1 meter above grade**, in accordance with IEEE Standard 644-2019 or most updated IEEE standard for **at normal (typical or average)** and **peak-loading** emergency conditions;
- b. Compare EMF of the proposed transmission line to current acceptable EMF exposure standards under **IEEE C95.1™ 2019** for electric transmission frequency; ~~Describe and justify the standard used; and~~
- c. ~~For residences within 250 ft of the edge of the right of way of either the Draft Route or the alternate route(s) there should be calculations of EMF levels outside of the residences compared with common household appliances~~

~~and applicable standard.~~ Calculate EMF out to 500 feet from the centerline. Provide examples of magnetic field levels from other common sources in everyday environments;

- d. The audible noise at the edge of the ROW in normal and foul weather using L_{AF}50 (60 minutes) metrics;
- e. Identify the wildfire hazard potential for the proposed transmission line in the immediately surrounding area; and
- f. Provide a brief description of stray voltage and potential impacts for the proposed transmission line.

Draft Guideline 4.16

Draft Guideline 4.16 requests information regarding property restoration post construction and specifically information regarding soil restoration and compaction for agricultural fields. ITC does not take issue this the language. Indeed, METC included similar information in its direct case and rebuttal case in Case No. U-21471. ITC also does not take issue with the language that an applicant is “encouraged” to consult with soil specialists during and after construction, but notes that Act 30 does not grant the Commission general authority to regulate construction activities. Including a suggestion that an applicant consult with a specialist during and after construction would therefore be inappropriate. If adopted, ITC proposes the following revisions to Draft Guideline 4.16 be included:

Guideline 4.16: The application should provide a detailed plan for property restoration post construction of transmission infrastructure. This should include details on soil restoration and compaction for agricultural fields. ~~The filing utility is encouraged to consult with an agricultural and soil conservation specialist during and after construction.~~

F. MISCELLANEOUS

While construction of major transmission lines is subject to Commission approval under Act 30, an applicant may voluntarily seek Act 30 approval and obtain a certificate of public convenience and necessity for non-major transmission lines. ITC would also recommend that the Guidelines make explicit that they either do not apply to non-major transmission lines, or, in the alternative, that applicants should meet with Staff in advance to determine how the Guidelines may apply in that context. This clarification will help ensure consistency, avoid confusion, and allow both applicants and Staff to align expectations at the outset.

Finally, although voluntary, ITC requests that the Commission's order specify an effective date of the adopted guidelines and clarify that the Guidelines will be considered in review of applications filed at least 90 days after the date of the order.

Respectfully submitted,

Dated: October 13, 2025

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DRAFT

**Voluntary Filing Guidelines for Applications
for Certificates of Public Convenience and
Necessity**

Pursuant to Public Act 30 of 1995

Case No. U-21930

September 12, 2025

Voluntary Filing Guidelines for Applications for Certificates of Public Convenience and Necessity under Public Act 30 of 1995

Background

Public Act 30 of 1995 (Act 30), MCL 460.561 *et seq.*, regulates the location and construction of certain electric transmission lines and grants authority to the Commission to issue certificates of public convenience and necessity for the siting of these transmission lines. Under Act 30, applicants are required to, among other things, apply to the Commission for a certificate of public convenience and necessity prior to constructing a major transmission line. MCL 460.567(1).

In its July 10, 2025, order in Case No. U-21930 (July 10 order), the Commission directed the Staff to work with appropriate electric utilities, affiliated transmission companies, independent transmission companies, and other interested persons to develop voluntary application filing guidelines to be used for future applications submitted to the Commission under Act 30. The July 10 order further directed that the voluntary application filing guidelines developed must, at a minimum, address the following issues:

- (1) the amount of overlap that is considered reasonable between an alternate route and a proposed route;
- (2) the degree to which private benefits need to be estimated in advance of a project;
- (3) the form and quality of information submitted as part of the summary of comments received at each public meeting and the applicant's response to those comments;
- (4) the methodology and qualitative factors that should be used in route studies to form the basis for the applicant's selection of the proposed and alternate routes, including the standardization of data presented to enable the Staff to efficiently analyze the routes explored without the need for extensive discovery;
- (5) requirements for documenting all landowner requests for minor modifications to a proposed or alternate route, what action was taken by the applicant in response to the request, and the reasoning why the applicant accommodated or failed to accommodate the request; and
any other issues the Staff and/or interested persons believe are necessary to improve the application process under Act 30.

Additionally, the Commission strongly encouraged the Staff to consider developing application filing guidelines that recommended that an applicant identify and evaluate more than one alternate route in an Act 30 application, including evidence that landowners along all alternate routes have received direct notice of the application and a meaningful opportunity to participate in the associated contested case proceeding. In conformance with the Commission's directives in the July 10 order, the following Voluntary Filing Guidelines for Applications for Certificates of Public Convenience and Necessity under Public Act 30 of 1995 are established.

Definitions:

Affiliated transmission company: A person, partnership, corporation, association, or other legal entity, or its successors or assigns, which has fully satisfied the requirements to join a regional transmission organization as determined by the federal energy regulatory commission, is engaged in this state in the transmission of electricity using facilities it owns that were transferred to the entity by an electric utility that was engaged in the generation, transmission, and distribution of electricity in this state on December 31, 2000, and is not independent of an electric utility or an affiliate of the utility, generating or distributing electricity to retail customers in this state.

Alternate route(s): The route(s) that an applicant or landowner identifies **in the applicant's statement of why** as an alternate to the applicant's proposed route for the major transmission line **was selected**, as required by MCL 460.567(2)(c) to be included in an application with the Commission.

Alternative route(s): The route(s) or route segment(s) that are submitted by ~~intervening parties~~ **a party to** in the course of the **a contested** case **to the Commission** that deviate from the **proposed** route(s) submitted by the applicant with its filing.

Applicant: The electric utility, affiliated transmission company, or independent transmission company that ultimately files an application with Commission for a certificate of public convenience and necessary under Act 30.

Electric utility: A person, partnership, corporation, association, or other legal entity whose transmission or distribution of electricity the commission regulates under 1909 PA 106, MCL 460.551 to 460.559, or 1939 PA 3, MCL 460.1 to 460.10cc. Electric utility does not include a municipal utility, affiliated transmission company, or independent transmission company.

Independent transmission company: A person, partnership, corporation, association, or other legal entity, or its successors or assigns, engaged in this state in the transmission of electricity using facilities it owns that have been divested to the entity by an electric utility that was engaged in the generation, transmission, and distribution of electricity in this state on December 31, 2000, and is independent of an electric utility or an affiliate of the utility, generating or distributing electricity to retail customers in this state.

Major transmission line: A transmission line of 5 miles or more in length wholly or partially owned by an electric utility, affiliated transmission company, or independent transmission company through which electricity is transferred at system bulk supply voltage of 345 kilovolts or more.

Proposed route: The route that an applicant identifies **and selects** as the ~~proposed~~ route **to construct for** a for the major transmission line for which a certificate of public convenience and necessity is requested, ~~as required by MCL 460.567(2)(b).~~

Study Area: The geographic area **general location** in which the applicant plans to study for the development of a transmission project that includes the geographic area where both

the ~~a~~ proposed and alternate route(s) are likely to be, however the exact location of the proposed and alternate route(s) is not yet known. ~~The Study Area should, at a minimum, include the area in which municipalities and landowners are required to be noticed as outlined in Guideline 2.1.~~

Objective:

This guidance document will be used by the Commission to ensure that proper notification and sufficient data is provided in cases such that the Commission can make an informed and appropriate determination.

Guidelines:

1. Construction Plans

MCL 460.564, Section 4(1) of Act 30 requires an electric utility, affiliated transmission company, and independent transmission company to submit a construction plan to the Commission for major transmission lines that the electric utility, affiliated transmission company, or independent transmission company plans to construct within the next five years. Act 30 requires construction plans to contain all the following:

- a. the general location and size of all major transmission lines to be constructed in the five years after planning commences;
- b. Copies of relevant bulk power transmission information filed by the electric utility, affiliated transmission company, or independent transmission company with any state or federal agency, national electric reliability coalition, or regional electric reliability coalition; and
- c. Additional information required by Commission rule or order that directly relates to the construction plan.

Guideline 1.1: As part of the additional information required by the Commission, the applicant must include the following information in its construction plan:

- a. Identification of the proposed Study Area for all major transmission lines to be constructed. ~~A Study Area is normally a regular polygon shape, however if there is an internal portion that an applicant has removed in its initial evaluation due to insurmountable engineering, environmental or social impacts please explain why it was reasonable to remove this subregion from the final Study Area;~~
- b. The estimated construction year and quarter of all proposed major transmission lines;
- c. The estimated length of all proposed major transmission lines;
- d. ~~A statement of the need for all proposed major transmission lines to be constructed;~~ **A brief statement explaining why a proposed major**

transmission line is to be constructed within the general location identified in the construction plan;

- e. A list of all municipalities and landowners, including their addresses, in which construction of the planned major transmission line is intended and to which the applicant provides a copy of the construction plan within the proposed Study Area;
- f. The name, address, telephone number, and email address for a dedicated contact person or persons who have knowledge of the development of the proposed major transmission line and are authorized to communicate on behalf of the electric utility, affiliated transmission company, or independent transmission company; and
- g. Detail of the applicant's process for soliciting and obtaining information from landowners and municipalities regarding the property or community characteristics in the Study Area that will be used to develop the applicant's proposed route and alternate route(s) submitted as part of the applicant's application with the Commission. The anticipated dates, times, and location of all public meetings the applicant intends to hold prior to filing an application.

2. Public Meetings

MCL 460.566, Section 6(1) of Act 30 requires an electric utility, affiliated transmission company, and independent transmission company to schedule and hold a public meeting in each municipality through which a proposed major transmission line for which a construction plan that has been submitted under Act 30 would pass. A public meeting held in a township satisfies the requirement of holding a public meeting in each affected village located within that township.

Guideline 2.1: As part of the public meetings required to by MCL 460.566, Section 6(1) of Act 30, an applicant should invite (i) provide notice to all affected landowners and municipalities through which the proposed major transmission line will pass; and (ii) including all landowners with property located within 500 feet of the centerline of any along any initial proposed and alternate route(s) provided in the construction plan. Additionally an applicant should widely publicize such public meetings utilizing reasonable methods such as geographically appropriate newspapers and social media outlets. Such efforts should endeavor to reach provide notice to all landowners and municipalities with property located within at least 500 feet one-mile of the centerline of the proposed right of way for all initial proposed and alternate route(s) identified in the construction plan for the proposed major transmission line; as well as all landowners and municipalities with property located within the geographic area between all proposed and alternate route(s) identified for the proposed major transmission line.

Guideline 2.2: The notice required in Guideline 2.1 should be in the form of a letter with verification of delivery to the taxpayer of record of the affected property and should include the following:

- a. ~~The date, time, and location of all public meetings scheduled for the proposed major transmission line;~~
- b. ~~The case number of the docket established for the proposed major transmission line, including instruction on how the person can sign up through the Commission's website to receive notifications about the docket;~~
- c. ~~A highlighted map of any initial proposed and alternate route(s);~~
- d. ~~If the line is more than five miles in length, a highlighted map of the geographic area within a one-mile radius of any proposed or alternate routes, as well as the land between those routes;~~
- e. ~~The name, address, telephone number, and email address for a dedicated contract person or persons who have knowledge of the development of the proposed major transmission line and are authorized to communicate on behalf of the electric utility, affiliated transmission company, or independent transmission company;~~
- f. ~~Details regarding the specific type of information the applicant is seeking from the noticed landowners and municipalities, such as:~~
 - i. ~~Particular characteristics about the landowner's property;~~
 - ii. ~~Land use; and~~
 - iii. ~~Features of historical or environmental significance.~~
- g. ~~Rights the applicant is potentially seeking from the noticed landowner.~~

[ITC recommends removing this Guideline; in the alternative, ITC proposes the following language:] **Guideline 2.2:** The invitation to be mailed in accordance with Guideline 2.1 should include the following information:

- a. The date, time, and location of all public meetings the applicant will hold for the proposed major transmission line;
- b. The case number assigned to the proceeding, if available, and a statement regarding the location of case information on the Commission's website;
- c. A link or QR code to the applicant's project website created under Guidelines 2.5; and
- d. The name and contact information for a representative(s) of the applicant knowledgeable about the proposed transmission line and authorized to speak on behalf of applicant.

Guideline 2.3: To further engage the public during the public meeting process and prior to filing, applicants are encouraged to identify and review multiple alternate routes with landowners and municipalities, developing a full understanding of land considerations and landowner comments when refining the final proposed and alternate routes that will be included as part of the application submitted to the Commission.

Guideline 2.4: Public meeting materials should be available for Staff review in **substantially final form within** 10 business days prior to the applicant holding the public meetings.

Guideline 2.5: An applicant should make available a way for landowners attending a public meeting to identify geographic features of their parcel or add comments, information regarding features of parcels or ~~potential minor route adjustments~~, and any other pertinent information regarding the location of the proposed major transmission line. This information should be translated into a geographic information system (GIS) to be used by the applicant. This could be done by having GIS systems available at the public meetings. A similar map-based interface should be hosted by the applicant on a website available to the public so that **parcel-specific** information and ~~alternate routes~~ may be submitted by those that were unable to attend a public meeting in person. This website should be available **for 14 days after the applicant's final public meeting**, ~~until 30 days prior to the Act 30 application being filed with the Commission.~~

Guideline 2.6: The applicant should ~~solicit~~ **consider as part of its route development for the proposed or alternate route(s) refinements, alterations, changes, or shifts suggested by affected landowners** ~~modifications, alternate segments, and alternate routes for the proposed major transmission line~~ **to the proposed or alternate route(s)** during the public meetings and from the map-based interface website specified in Guideline 2.5.

Guideline 2.7: ~~The evaluation factor data by route segment for route segments studied in the routing study that derived the construction plan should be made available during public meetings, as well as on the online map-based interface, specified in Guideline 2.5.~~

Guideline 2.8: ~~Interested parties~~ **The applicant should be able allow the public** to submit comments and feedback via a website available to the public **from a period starting the day of the applicant's first public meeting until 14 days after the applicant's final public meeting. Responses to such comments should be included in the summary required in the application as if the comment were received at a public meeting.** ~~prior to the filing of the application with the Commission. If the commenter leaves an email address, the applicant should provide a response to that email address.~~ **An applicant should consider directly responding to and/or following-up with public meeting attendees and comments received via a website (described in this Guideline) to the extent such response is requested and practical and if the attendee or commenter provides the applicant with either a phone number, mailing address, or email address when making the public comment.**

Guideline 2.9: All landowner comments, route adjustment requests, etc. received by the applicant and all applicant responses to those comments, requests, etc. should be thoroughly documented by the applicant.

Guideline 2.10: Any substantive landowner request that is not granted should include a description of how the modification was considered and why it was not able to be reasonably accommodated.

Guideline 2.11: During all public meetings, the applicant should provide the following information:

- a. ~~Transmission line detail as relates to public health, including any post-construction testing or evaluation (EMF, stray voltage, etc.) presented by a subject matter expert who is available to discuss EMF regulations and how the project is designed to meet or exceed those regulations;~~ **Information related to the status of research on electric and magnetic fields (EMF) as reviewed by national and international health and scientific organizations, and explain how the project meets public health guidelines (i.e., ICNIRP, 2010; IEEE/ICES, 2019). Information on the electrical effects such as audible noise also should be available;**
- b. **General information supporting the need for the proposed major transmission line;** ~~The need for the line;~~
- c. An estimated tax revenue by township due to the project;
- d. The construction process and safety measures for the proposed major transmission line;
- e. Environmental impact mitigation;
- f. **General information about land acquisition post-certificate** ~~Rights the applicant is seeking from landowners, for example sharing a sample easement;~~
- ~~g. A high-level overview of the landowner compensation process;~~
- g. General information about** ~~P~~ **post construction property restoration procedures and requirements; and**
- h. The case number of the docket established for the proposed major transmission line, including instructions on how the person can sign up though the Commission's website to receive notifications about the docket.**

3. Application Public Notice

MCL 460.568, Section 8(1) of Act 30 requires an applicant, upon applying for a certificate of public convenience and necessity, to give public notice in the manner and form prescribed by the Commission of an opportunity to comment on the application. Act 30 further requires an applicant to publish notice in a newspaper of general circulation in the area to

be affected and to send notice to each affected municipality and landowners on whose property a portion of the proposed major transmission line will be constructed.

Guideline 3.1: The Commission may prescribe the manner in which the public notice of an opportunity to comment on the application is provided. Accordingly, all the following apply:

- a. **In addition to complying with MCL 460.568(1), applicants are strongly encouraged to give public notice to any municipality and landowner within 500 feet, or any other distance requested to be included for modification authority in a certificate, on either side of the centerline for the proposed and alternate route(s) included in the application** ~~An applicant should provide public notice to each municipality and landowner with property located along the proposed and alternate route(s) identified in the application for the proposed major transmission line. Additionally, an applicant should provide public notice to all municipalities and landowners with property located within a one-mile of the centerline of the right of way for all proposed and alternate route(s) identified in the application for the proposed major transmission line. An applicant should also provide public notice to all municipalities and landowners with property located in the geographic area between all proposed and alternate route(s) identified for the proposed major transmission line;~~
- b. Public notice should be in the form of a ~~certified~~ letter **with delivery tracking** to the taxpayer of record of the ~~affected~~ property **identified in Guideline 3.1(a)** and should include the following:
 - i. ~~The case number of the docket established for the proposed major transmission line, including instructions on how the person can sign up through the Commission's website to receive notifications about the docket;~~
 - ii. ~~A highlighted map of the initial proposed and alternate route(s) identified in the application;~~
 - iii. ~~If the line is more than five miles in length, a highlighted map of the geographic area within a one-mile radius of the proposed and alternate routes, as well as the land between them;~~
 - iii. The name, address, telephone number and email address for a dedicated contact person or persons who have knowledge of the development of the proposed major transmission line and are authorized to communicate on behalf of the applicant;

~~iv. Detail regarding the type of information the applicant is seeking from the noticed landowner, such as:~~

- ~~1. Particular characteristics about the landowner's property;~~
- ~~2. Land use; and~~
- ~~3. Features of historical or environmental significance.~~

iv. Rights the applicant is potentially seeking from the noticed landowner.

Guideline 3.2: MCL 460.568, Section 8(4) of Act 30 permits a party to a contested case proceeding established for the proposed major transmission line to submit alternative routes or route segments. Any alternative route or route segment proposed **presented** by a party to the contested case proceeding **may only traverse property which received notice in accordance with Guideline 3.1.** ~~should be confined to the notice area from those noticed in Guideline 3.1 and should be proposed before cross examination occurs in the contested case proceeding. Upon receipt of an proposed alternative route or route segment, the applicant should provide notice to all landowners with property located on the newly proposed alternative route or route segment. The letter should include notice that the landowner is now located on a proposed alternative route and should include information on how the affected landowner can seek intervention in the contested case proceeding.~~

4. Application Materials

MCL 460.567, Section 7(2) of Act 30 describes the information that must be included in an application submitted to the Commission. The required information includes:

- a. The planned date for beginning construction;
- b. A detailed description of the proposed major transmission line, its route, and its expected configuration and use;
- c. A description and evaluation of 1 or more alternate major transmission line routes and a statement of why the proposed route was selected;
- d. If a zoning ordinance prohibits or regulates the location or development of any portion of a proposed route, a description of the location and manner in which that zoning ordinance prohibits or regulates the location or construction of the proposed route;
- e. The estimated overall cost of the proposed major transmission line;
- f. Information supporting the need for the proposed major transmission line, including identification of known future wholesale users of the proposed major transmission line;
- g. Estimated quantifiable and non-quantifiable public benefits of the proposed major transmission line;
- h. Estimated private benefits of the proposed major transmission line to the applicant or any legal entity that is affiliated with the applicant;

- i. Information addressing potential effects of the proposed major transmission line on public health and safety;
- j. A summary of all comments received at each public meeting and the applicant's response to those comments;
- k. Information indicating that the proposed major transmission line will comply with all applicable state and federal environmental standards, laws, and rules; and
- l. Other information reasonably required by the commission pursuant to rule.

Guideline 4.1: ~~Prior to submission of the application to the Commission, the applicant should provide Staff with a SharePoint drive containing:~~

- ~~a. All landowner comments received by the applicant at any public and the applicant's responses to those comments; and~~
- ~~b. All route adjustments submitted by affected landowners and the applicant's response to each request.~~

[ITC recommends removing this Guideline; in the alternative, ITC proposes the following language:]

Guideline 4.1: An applicant's public comment summary should clearly identify the main topics or concerns raised at each public meeting in each municipality. A summary may include a statement related to the frequency in which the topic or concern was raised. Example comments may be helpful in explaining the topic or concern. The public comment summary should include detailed, proportionate responses to each topic and concern summarized, including acknowledgment of the comments and a concise explanation of how the applicant considered, evaluated, or addressed the topic or concern. Copies of all public comments received by an applicant from a public meeting or from the GIS system as outlined in Guideline 2.5 should be made available to Staff electronically simultaneously when the application is filed.

Guideline 4.2: As part of its application for the proposed major transmission line, the applicant should provide detail about how the applicant complied with all requirements outlined in Act 30 and in these guidelines for the construction plan, public meeting invitation notice, public meetings, application public notice, and application materials.

Guideline 4.3: The applicant should include a discussion of how the applicant determined the Study Area. ~~Any areas that are not considered because they were not reasonable and/or feasible should be discussed along with the methodology that determined them to be unreasonable and/or unfeasible.~~

Guideline 4.4: The applicant is encouraged, in addition to the proposed route, to identify and assess more than one utility alternate route for the proposed major transmission line in the application submitted to the Commission. ~~In addition, the applicant should include all landowner alternate routes and alternate route segments proposed by any landowner as one of the alternate routes for the proposed major transmission line, complete with the~~

applicant's assessment of those alternate routes and route segments using the applicant's identified evaluation factors:

Guideline 4.5: The application should include all alternate routes and alternate route segments proposed requested by any landowner as one of the alternate routes for the proposed major transmission line, complete with the applicant's assessment of those alternate routes and route segments using the applicant's identified evaluation factors:

[ITC recommends removing this Guideline; in the alternative, ITC proposes the following language:]

Guideline 4.5: An application should identify all route refinements, adjustments, changes, or shifts made to a route between a construction plan and the alignment of the proposed route as presented in the application, if applicable. For each refinement, the applicant should identify the data, factors, and considerations that explain the alignment of the proposed route as presented in the application, including whether the refinement, adjustment, change, or shift was influenced by stakeholder or public input.

Guideline 4.6: The application should include **electronic** maps of all proposed and alternate routes **in KML or KMZ format** a google earth format for easy use by Staff and intervenors. These maps should include the following:

- a. Parcels crossed as well as any existing electrical utility easements on the parcel, **if known to the applicant;**
- b. Geological composition and soil type within the area of notice described in Guideline 3.1;
- c. Labeling of route segments;
- d. Any known endangered wildlife habitat or wildlife refuge; **and**
- e. **Any known dwelling within** **Depiction of the requested** right of way (ROW); **and**
- f. ~~Any obstacle that was deliberately avoided through development of the proposed and alternate route(s).~~

Guideline 4.7: The application should include pertinent engineering information regarding the transmission equipment, including but not limited to:

- a. Discussion of reasons that the equipment is above ground or below ground;
- b. Designed voltage rating;
- c. Operation voltage rating;
- d. If the transmission equipment is above ground:
 - i. ~~Conductor size and type of structures~~ **Type of structures, conductor size, and midspan clearance above ground at peak loading;**
 - ii. Height of typical structures;
 - iii. Explanation of why these structures were selected; and

- iv. Dimensional drawing of typical structures to be used in the project.
- e. If the transmission equipment is below ground or underwater:
 - i. Burial depth;
 - ii. Type of cable and a description of any required supporting equipment, such as insulation medium pressurizing ~~or forced cooling~~;
 - iii. ~~Cathodic protection scheme; and~~
 - iii. Type of dielectric fluid and safeguards used to limit potential spills in waterways, **if applicable**;-
 - iv. **Horizontal and vertical clearances from adjacent utilities;**
 - v. **Dimensional drawing of typical structures to be used in the project such as cable vaults; and**
 - vi. **Required maintenance easements.**

Guideline 4.8: The application should include route and segment scoring data. This includes the following:

- a. Raw evaluation factors and any quantitative data used to evaluate potential routes from a routing study or similar development of candidate routes presented in an excel format with any equations intact. Raw evaluation factors should be presented on a route basis ~~as well as per routing section basis to assist with evaluation of intervenor-suggested alternatives~~;
- b. Any quantitative analysis done on evaluation factors or quantitative data used to evaluate potential routes that resulted in narrowing of potential routes considered. This includes selection of the proposed and alternate routes;
- c. Any formal ~~or informal~~ weighting factors that the applicant used in the scoring of the potential routes, if used, and how these weighting factors affected the selection of proposed and alternate routes;
- d. ~~Evaluation factor data from the proposed and alternate routes as filed after refinement and increased data granularity is available from environmental impact study, LiDAR scans, etc., presented in excel format with any equations intact; and~~
- d. Data sources for final evaluation factors. If the applicant utilized multiple sources for a single evaluation factor in finalized data, explain how these were incorporated with one another.

Guideline 4.9: **Applicants should address each of the factors listed below to the extent relevant and practical for the specific project. In instances where a factor is not applicable**

or cannot reasonably be evaluated, the applicant's routing experts may exercise professional judgment to modify or exclude such factor, with a brief explanation provided in testimony or exhibits. Route and segment scoring data should include at least the following:

a. Engineering data

i. Length

ii. Number of angles greater than 30 degrees

iii. Road/railroad crossings

iv. Transmission line crossings

v. Length replacing existing transmission line

vi. Paralleling to existing linear features, including but not limited to:

1. Existing transmission line
2. Public road or highway
3. Recreational trails
4. Existing pipelines
5. Property or section lines
6. Existing railroad or railroad rights of way

vii. Land use

1. Greenfield
2. Extraction
3. Military installation
4. Animal feeding operations
5. Farmland
6. Center pivot irrigation in ROW
7. Solar Farms within 500 feet of the proposed centerline
8. Wind Turbines within 500 feet of the proposed centerline

b. Environmental data

1. Wetland within ROW
2. Hydric soil within ROW
3. Rivers/streams/waterways crossed
4. Woodland within ROW
5. Grassland/Pasture within ROW
6. Threatened and Endangered Species Critical Habitat
7. National wildlife refuges

c. Social data

- i. Historic sites within 500 feet of the proposed centerline
- ii. Schools within 500 feet of the proposed centerline

- iii. Places of worship within 500 feet of the proposed centerline
- iv. Hospitals and nursing homes within 500 feet of the proposed centerline
- v. Memorial parks/cemeteries within 500 feet of the proposed centerline
- vi. National Landmarks/monuments within 500 feet of the proposed centerline
- vii. Airport obstacle free zones
- viii. VHF Omnidirectional Range and Tactical Air Navigation (VORTAC) sites
- ix. Archeological sites within the proposed ROW
- x. Total area of the proposed new ROW required
- xi. Number of parcels within the proposed ROW
- xii. Residences
 - 1. Within 100 feet of the proposed centerline
 - 2. Within 101-300 feet of the proposed centerline
 - 3. Within 301-500 feet of the proposed centerline
- xiii. Buildings
 - 1. Within 100 feet of the proposed centerline
 - 2. Within 101-300 feet of the proposed centerline
 - 3. Within 301-500 feet of the proposed centerline
- xiv. Public facilities
 - 1. Within 100 feet of the proposed centerline
 - 2. Within 101-300 feet of the proposed centerline
 - 3. Within 301-500 feet of the proposed centerline
- xv. Municipal boundaries
- xvi. Public lands
- xvii. Visibility score

Guideline 4.10: ~~If the proposed route or alternate route(s) include segments in common or overlap, the application should explain, in the applicant's professional judgment, provide justification that includes:~~

- ~~a. Engineering, environmental or social rationale reasons for the overlap; and~~
- ~~b. Any other rationale about why the overlap is the only practically feasible route in that geographic area.~~

Guideline 4.11: If the application includes new substations, the following information should be provided:

- a. **A general explanation of how the existing transmission system will be integrated into the new substation** Existing lines that will be tied into the new substation; and
- b. **If an application includes a request for approval for existing lines to connect into a new substation, a** A line diagram of how the substation will be connected to the existing system; and
- c. ~~Explanation of how the filing entity plans on rerouting existing lines into new substation.~~

Guideline 4.12: The application should present the estimated private benefits of the proposed major transmission line to the applicant or any legal entity that is affiliated with the applicant. This should include the following:

- a. A complete calculation estimating the private benefits the applicant or any legal entity affiliated with the applicant will receive from the construction and management of the project. This should be included in the application as an exhibit with a native excel file with equations intact provided as a workpaper filed concurrently with the application; and
- b. A discussion of any benefits the applicant or any legal entity affiliated with the applicant will receive that are not quantifiable.

Guideline 4.13: Under public benefits, the application should, **to the extent applicable to the proposed transmission line,** include ~~projected tax revenue by township estimates regarding local economic investment, job creation, and potential local tax revenue~~ due to the construction and maintenance of the project.

Guideline 4.14: The applicant should provide the following information regarding its proposed right of way:

- a. **Explanation that** Justification for the proposed width of the right of way **aligns with,** including a quantitative analysis that is based on North American Electric Reliability Corporation (NERC), **National Electrical Safety Code Standards (NESC), or other relevant industry standards, as applicable, and related documentation or analysis.** requirements where the end result of the quantitative analysis is width of ROW; and
- b. ~~Consideration taken for proximity to dwellings.~~

Guideline 4.15: **The applicant should provide detail about potential public health and safety impacts of a proposed transmission line, including the following:** EMF, Stray Voltage, and Public Health:

- a. ~~Provide detail about how the applicant has minimized any potential health impacts of the project including EMF, audible noise along with the audible noise what~~

threshold that the transmission line is being built to, and fire risk should be presented with the application;

- a. Calculate resultant power-system frequency magnetic and electrical fields (EMF) at the edge of the ROW and in at the centerline of the ROW, at 1 meter above grade, in accordance with IEEE Standard 644-2019 or most updated IEEE standard for at normal (typical or average) and peak-loading emergency conditions;¹
- b. Compare EMF of the proposed transmission line to current acceptable EMF exposure standards under IEEE C95.1TM 2019 for electric transmission frequency; Describe and justify the standard used; and
- c. For residences within 250 ft of the edge of the right of way of either the Proposed Route or the alternate route(s) there should be calculations of EMF levels outside of the residences compared with common household appliances and applicable standard. Calculate EMF out to 500 feet from the centerline. Provide examples of magnetic field levels from other common sources in everyday environments;
- d. The audible noise at the edge of the ROW in normal and foul weather using L_{AF}50 (60 minutes) metrics;
- e. Identify the wildfire hazard potential for the proposed transmission line in the immediately surrounding area; and
- f. Provide a brief description of stray voltage and potential impacts for the proposed transmission line.

Guideline 4.16: The application should provide a detailed plan for property restoration post construction of transmission infrastructure. This should include details on soil restoration and compaction for agricultural fields. The filing utility is encouraged to consult with an agricultural and soil conservation specialist during and after construction.

¹ IEE Standard Procedures for Measurement of Power Frequency Electric and Magnetic Fields from AC Power Lines, <https://standards.ieee.org/ieee/644/6732/>, Accessed 8/29/2015