BEFORE THE
PUBLIC SERVICE COMMISSION OF WISCONSIN

Petition of Brett Healy for Declaratory Ruling to
Determine Allocation of Costs for Relocation of Utility
Structures for Milwaukee Streetcar Project

Docket No. 5-DR-109

PETITIONER’S RESPONSE BRIEF

The briefs filed by the City of Milwaukee and the League of Cities do not establish that the PSC has no jurisdiction to exercise its discretion to consider Petitioner Brett Healy’s request for a declaration pursuant to § 227.41 Wis. Stat. They do not establish that Healy is not an interested person under that statute and thus that he has no standing to seek the declaration requested. And they do not establish that Healy’s request is premature. The streetcar route has been decided for all practical purposes and all of the affected utilities have intervened, confirming Healy’s allegations that the Streetcar Project will necessarily involve very substantial utility relocation or reinforcement costs.

The City’s efforts to suggest that Healy is a political activist intent on killing the Streetcar Project are completely unfounded and in any event are beside the point. Its’ suggestion that he wishes to “address…whether the City’s streetcar project best meets the community’s needs and interests in public transportation…” and that he just wants to “kill” the streetcar, misapprehends the nature of this petition and its purpose.

This is not about whether to have a streetcar, but determining who must bear the costs. Perhaps the City’s adamant opposition to letting the public know the answer to this question before the project becomes a fait accompli reflects its recognition that citizens, given all of the information, may be unwilling to pay them. But that is not the issue here.
Indeed, the City of Milwaukee has consistently told City taxpayers that their taxes will not be increased to fund the Streetcar Project as the capital costs will be completely covered by a federal grant and initial TIF district funding. The Project budget and the Final EA include no costs for utility relocation or reinforcement. It is likely, then, that those substantial costs will be passed along to Wisconsin Energy ratepayers and to the customers of the telecommunications and cable companies stuck with the costs. There is no free lunch. Someone will pay the costs of utility relocation. The City clearly intends to impose them on the utilities and, indirectly, on their ratepayers and customers.

This is properly a question for the Commission to decide, and for it to decide now. The citizens of Southeastern Wisconsin have a right to know who will pay the utility costs before they have been made inevitable by the City of Milwaukee’s continuing obfuscation. That is good government, not politics.¹

I. The Petition is Not Premature.

Whether or not this matter is ripe for consideration by the Commission depends on the answer to only two questions.² First, will the Streetcar Project involve substantial utility relocation or reinforcement costs? And second, given the fact that none of those costs are accounted for in the streetcar budget, does the City intend that the affected utilities will absorb those costs? The answer to both questions is unequivocally yes, and the City should not be

¹ Of course, this proceeding cannot “kill” the Streetcar project. The City could pay for the relocation cost itself or seek funding from state, local or private sources. If it were to “kill” the project, it would only be because the City – or its residents – had decided that the project is not worth its actual cost.
² The City suggests as well that another “hypothetical” question is involved: whether the City can negotiate cost allocation agreements with the affected utilities that are acceptable to both it and the utilities. Of course, the City’s ability to negotiate depends in large part on whether it can lawfully require the utilities to bear the costs, whatever they might be. That is the question the Commission has been asked to consider, and probably explains why all of the affected utilities have intervened. Furthermore, that question is irrelevant to the Petitioner’s interest in avoiding bearing any of the cost of Milwaukee’s streetcar. His interest is not synonymous with that of the utilities.
permitted to run away from them. Either the City can lawfully impose these costs on affected utilities or it cannot. There is no question that this question is ripe for consideration by the Commission.

The City’s brief claims that the Streetcar Project has only reached the stage of “very preliminary... project design” and that for that reason the utility impacts, cost estimates and potential rate impacts are “completely speculative.” City Br. at 12. It claims that the WEPCO utility relocation costs for the Streetcar Project are at this point unknown. That WEPCO will incur any relocation costs at all is, the City says, simply “hypothetical.” City Br. at 13. These claims are preposterous. City residents have been told that the project will not exceed the budget that has been created for it, and that it will be completely paid for by a combination of federal grants and TIF funding, leading to no increase in taxes for City residents. If the Streetcar Project cost estimates are at this point completely speculative, the City has been engaged in nothing less than governmental malpractice.

The Streetcar Project is not “speculative” in any respect that is important to the Commission’s resolution of the question that Healy has asked it to consider. The project design has reached the point where we can say with certainty that the project will involve streetcars that will travel over downtown City streets on fixed streetcar tracks. There is no question that the construction of any project involving these three elements will necessitate the relocation or reinforcement of WEPCO and other utility infrastructure. The final design and exact costs may not now be known, but all of the affected utilities have provided the City with preliminary estimates that those costs will be very substantial, especially when compared to the City’s project budget. The Common Council has approved the project and directed the Commissioner of Public Works to proceed with the work. Healy Opening Br. at 4, Ex A. That approval was
based on a detailed draft Environmental Assessment. The Final Environmental Assessment, substantially identical to that draft, has now been submitted to and approved by the U.S. Department of Transportation. \textit{Id.}

The Final EA states that the City’s consideration of alternatives for the streetcar route began in August 2009 and was completed in 2010. Final EA at 29. The City considered three alternative routes, all subject to a previously-determined requirement for “fixed guideway” (i.e. streetcar) transit service in downtown Milwaukee. \textit{Id.} The City engaged in a three-step process to evaluate the selected alternative routes that included technical analysis, public outreach and alternative ranking. \textit{Id.} at 38. During the course of its extensive analysis, the City considered a variety of suboptions for each of the selected routes. \textit{Id.} at 41. Alternative 1 was selected for further analysis along with two suboptions – Alternatives 1-2A and 1-2B. \textit{Id.} at 41-42. In May 2010, the City selected Alternative 1-2A as the locally preferred alternative and it was that route that was the subject of the Final EA and that now has been approved by the Department of Transportation.

It is absurd for the city to assert that this most primary element of the streetcar project is preliminary or uncertain. There may be final design changes to the track alignment and track structure, as the City suggests in its brief. City Br. at 12. And as the City’s expert suggests, it surely is true that utility costs cannot finally be determined until the project has passed beyond what the City describes as the 30% design level, the final engineering decisions as to track alignment and so forth have been made, and the utilities have completed their own design work. Polenske Aff. ¶ 7. But nothing in the City’s submissions indicates or even suggests that there is even a remote possibility that the route selected after years of study, technical analysis, community outreach and environmental evaluation and approvals, will be changed.
There can really be no question at this point that the final route over city streets has been selected and that the streetcar map route is not going to be changed. The Common Council has approved the route selected and the project is going forward. Utility costs may not be known with exacting precision, but there will be costs and they will be substantial. As the City has already acknowledged, “underground utility lines would need to be relocated or reinforced on nearly all blocks along the streetcar alignment.” Final EA at 124. That is not speculation, but fact. Healy asks only that the Commission decide whether the City and its taxpayers should properly bear the utility relocation costs of their Streetcar Project.

Again, Petitioner has no idea why the City is unwilling to acknowledge the obvious fact that utility costs will be incurred or is afraid to say that it expects the utilities to absorb them. But the Commission is not obligated to play along. The Commission certainly may, and should, decide whether the City’s plan passes muster under the Wisconsin laws that the Commission is charged to enforce.

II. Section 196.58(4) Wis. Stat. Does Not Deprive the Commission of Jurisdiction to Consider the Petition.

The City claims that Healy seeks to use § 227.41 Wis. Stat. to “circumvent the express limits on the Commission’s jurisdiction to review a municipal ordinance” imposed by § 196.58(4) Wis. Stat. That is because, the City says, only a public utility or qualified complainant can trigger the Commission’s jurisdiction to determine the reasonableness of an ordinance under § 196.58. City Br. at 3, 6. But, as Healy explained in his opening brief, § 196.58(4) is merely one grant of authority among many. It provides only that the Commission “shall” hold a hearing on the reasonableness of such ordinances if a complaint is filed by a utility or a qualified complainant. Nothing in § 196.58(4) purports to limit the Commission’s
jurisdiction to consider such matters only to those cases in which a formal complaint has been authorized, and the Commission is required to act. Indeed, the Commission’s General Counsel explained in a September response to a legislative inquiry, the Commission has jurisdiction under as many as six distinct statutes: § 196.26, § 196.28, § 196.49, § 196.58, § 227.41, and those governing a rate proceeding. Cynthia Smith Letter to Senator Van Wanggaard dated Sept. 23, 2011 (copy attached, Exhibit AA).

The cases cited by the City in its brief do not deal with any limits on the Commission’s jurisdiction under § 196.58 and cannot be read to suggest that any such limitation can read into § 196.58(4). Superior v. Committee on Water Pollution, 263 Wis. 23, 56 N.W.2d 501 (1953) says only that the plaintiff city could not initiate a declaratory judgment action in the circuit court to challenge an administrative decision, where the statute in question afforded an opportunity and provided a specific method of seeking judicial review. In State v. WERC, 65 Wis. 2d. 624, 223 N.W.2d 543 (1974), the plaintiff unsuccessfully sought to initiate a declaratory judgment action and petition for review in the circuit court to challenge an administrative agency ruling that the court held was not final. And in Town of Burke v. Madison, 17 Wis. 2d 623, 117 N.W.2d 580 (1962), the court declined to permit judicial review by way of declaratory judgment where the plaintiff possessed, yet failed to invoke, the right to an administrative appeal.3

At most, these cases establish the proposition that the courts may not exercise their declaratory judgment jurisdiction to intrude on matters that are subject to statutory administrative adjudication, or to entertain appeals of administrative decisions where the statutes provide a method for seeking administrative review that the plaintiff wishes to circumvent. They have no

3 In each of these cases, moreover, it made sense to assume that the creation of a method to review an agency decision subject to judicial review was exclusive. Here the question is whether an agency may only proceed in a certain way and both Chapters 196 and 227, as explained in the text, make clear that §196.58 is not exclusive.
direct application to the question of Healy’s standing or to the Commission’s jurisdiction in the circumstances presented here. Healy has not filed his case in circuit court and in any event has no administrative remedy to circumvent.

The City nevertheless says that these cases establish a “principal” [sic] that severely limits the Commission’s jurisdiction. “The Legislature set forth a specific grant of authority in Wis. Stat. § 196.58(4) pursuant to which [the Commission] has jurisdiction to review a municipal contract, resolution or ordinance.” City Br. at 6. Thus, according to the City, the Commission has no authority to consider matters relating to § 196.58 unless and until someone files a complaint. The statute itself does not expressly limit the Commission’s jurisdiction to such matters. And to conclude that the Legislature intended to so limit the Commission’s jurisdiction based on a legal principle relating to circuit court reviews of agency decisions would plainly be inconsistent with the Legislature’s broad grant of jurisdiction to the Commission to regulate public utilities within the state.

Section 196.58(4) on its face does nothing more than provide that certain persons can require the Commission to hold a hearing on their complaint that a municipal ordinance or resolution is unreasonable and in violation of § 196.58(1). This statutory language does not say that the Commission’s jurisdiction to consider such ordinances or resolutions in any other context – such as through the lens of Wis. Admin. Code PSC § 130.09(1) – is limited in any way. Indeed, § 196.58(5) provides specifically to the contrary, that nothing in § 196.58 shall limit the power of the Commission “to regulate the service of public utilities.” There is no freestanding principle of Wisconsin jurisprudence that could be applied here to suggest that, given the Legislature’s extremely broad grant of authority to the Commission to regulate public utilities, it
here intended to severely limit the Commission’s jurisdiction but did so without putting clear and explicit language to that effect in the statute in question.

If the Commission has jurisdiction, then it has discretion to consider Healy’s petition under § 227.41 Wis. Stat. As Healy has shown, he is a ratepayer and therefore an “interested person” for purposes of that statute and nothing further is required. The City does not, and probably could not, argue that Healy does not fall within the definition of “interested person” in § 227.41. Given the Commission’s discretion, the “parade of horribles” suggested by the City and League of Municipalities will never happen. The PSC will hear what it believes it should hear in performing its statutory obligations. No more. Determining who must pay for tens of millions of dollars in relocation costs is certainly something that it might find worthwhile to address.

Although it not clear why it would be relevant to the § 227.41 test, the City does suggest that Healy may, at some future point, have an alternative method of protecting the economic interest that the City necessarily concedes that he does have in the outcome here. Under Wisconsin Public Serv. Corp v. PSCW, 156 Wis. 2d. 611, 457 N.W.2d 502 (1990), the City says that Healy could challenge any future rate increases sought by Wisconsin Energy to the extent they reflect the costs at issue here. But under that case, Healy’s right to challenge the rates depends on Wisconsin Energy’s failure to timely resist the City’s imposition of costs. Should the utility reach some agreement on costs with the City, the costs will be passed along to Healy and other ratepayers.

This is why the City’s repeated suggestion that it will “cut a deal” with WE Energies or other utilities – a deal which, in the nature of things, may be based on concerns other than the merits of the question before the Commission. The PSC is not required to treat the utilities as
"representatives" of their customers. In any event, the Commission need not, as the City suggests, require Healy to demonstrate that he would have standing to assert a judicial claim for declaratory judgment. Section 227.41 is intended to grant the Commission broad discretion to hold hearings on matters within its jurisdiction if requested to do so by an interested person. Nothing further is required by the statute. The rules which have been developed to govern actions for declaratory judgment cases filed in circuit court have no obvious application here. This is not a court. There is no need for Healy to establish a "justiciable controversy" under Wisconsin court rules and statutes related to judicial declarations before the Commission can consider a matter within its jurisdiction.

As much as the City would like to avoid and obfuscate reality, the fact remains that the utility costs for the Streetcar Project will be real and substantial, and someone will have to pay them. Healy may be one of those persons. Indeed it seems more than clear that the City's intent is that the utility ratepayers, and not the City taxpayers, are the ones who will bear the costs. As such, Healy is an "interested person" for purposes of § 227.41.

As recently as last September, the Commission's General Counsel offered an opinion on the "standing" issue that is the subject of this briefing. In response to legislative inquiries Ms. Smith stated clearly that:

- Wisconsin Stat. § 227.41 allows the Commission to issue a declaratory ruling if a petition is filed by an interested person regarding whether a utility would be obligated to pay for moving its facilities associated with the Streetcar Project. Here, an affected utility or a ratepayer could request a declaratory ruling.

Ex. AA at 5. She further noted that "the Commission has sufficient statutory authority . . . to address the issue . . . . If and when the issue is presented to the Commission for a decision in any of the ways outlined above, the Commission will then be able to address the question of cost responsibility for moving or modifying utility facilities." Ex. AA at 6 (emphasis added). Healy
has demonstrated that Ms. Smith was unquestionably correct in her analysis of the Commission’s jurisdiction, and of the standing of a ratepayer such as Healy to file a petition under § 227.41. The Commission should so rule and the hearing should proceed on the merits.

Dated this 20th day of February, 2012.

Respectfully submitted,
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September 23, 2011

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The Honorable Leah Vukmir, State Senator
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Re: Proposed streetcar project in the City of Milwaukee

Dear Senators Wanggaard and Vukmir:

This letter responds to questions regarding the proposed streetcar ("Streetcar Project") in the City of Milwaukee ("City.") The Public Service Commission has been following the developments involving the proposed Streetcar Project but, to date, has not been directly involved in this issue. As I understand the situation, the City has proposed building a 2.1 mile streetcar line, which would start providing service in 2014. On July 26, 2011, the Milwaukee Common Council voted to authorize final engineering of the Streetcar Project. The website http://themilwaukeestreetcar.com shows a proposed route and estimates that construction will begin in the Fall of 2012, with operation commencing in the Fall of 2014, but the Commission has only limited information about the effect the Streetcar Project may have on overhead or underground public utility facilities.

You asked several questions regarding this matter. Chairperson Montgomery has asked me to address each of your questions. Following are my responses based on the information we have so far. It is important to note that this opinion and response is based on the information available to date. Should additional information become available, it may be necessary to conduct further legal analysis which may change some of the responses or preliminary opinions expressed in this letter.

1) What infrastructure could potentially be affected by this project? Specifically, what kinds of infrastructure would have to be moved or modified in some fashion, and who owns the affected infrastructure?

Exhibit AA
Based on the information the Commission has to date, it appears that at least WEPCO, ATC and AT&T have facilities that would be affected by the Streetcar Project as currently proposed. WEPCO has electric, natural gas and steam lines. ATC has electric transmission facilities. AT&T and other telecommunication providers that co-locate facilities in AT&T’s Broadway Street switching office have communication lines that would be affected. To the Commission’s knowledge, all of these utility lines are underground. The City would also have water, sanitary sewer and storm sewer facilities affected by the project, but the Commission has not attempted to gather that information at this time, nor have we been asked to do so.

2) What is the approximate cost for moving the utility facilities and equipment? Most importantly, who would pay for the costs: ratepayers, Milwaukee property taxpayers, or another party?

The utilities’ preliminary estimated costs of moving or modifying these facilities due to the Streetcar Project are:

- **WEPCO**: $45 million.
- **ATC**: $0.5 million to $15.4 million depending on need for corrosion protection for the steel conduit holding the underground transmission lines because of proximity to DC (direct current) lines powering the proposed streetcars.
- **AT&T**: $10 million. This estimate is for AT&T costs only. The Commission does not have estimates for costs that would be incurred by other co-located telecommunications providers.

Please note that the preliminary cost estimates noted above come from WEPCO, ATC, and AT&T, and the Commission has neither independently analyzed nor confirmed the accuracy of these estimates. Given that the proposed Streetcar Project is in the development phase, I would expect these estimated figures to change as plans are finalized.

Both state law and the Commission’s administrative rules provide some guidance regarding the allocation of costs between a municipality and a public utility. Typically, a utility is able to use municipal street right-of-way for the placement of its facilities at its convenience. Under Wis. Stat. § 66.0831, when work done by or for a municipality in a street right-of-way requires a public utility to temporarily protect or move its facilities, the public utility is liable for the costs.
Also, if and when the municipality needs to undertake street reconstruction requiring the utility to move or modify its facilities, the utility costs would be the obligation of the utility. State law generally allows a municipality to set the terms and conditions on which a public utility can occupy the streets, highways and public places in the municipality, but these terms and conditions must be reasonable. Wis. Stat. § 196.58(1)(a). If the Commission receives a complaint, it must set a hearing and determine the reasonableness of the municipality’s requirements.

Under Wis. Admin. Code § PSC 130.09(1), if a municipality requires a utility to relocate its facilities permanently, the municipality may only require the utility to pay the costs if the municipality has “an adequate health, safety, or public welfare justification for the requirement.”

The Wisconsin Supreme Court has examined how a municipality’s actions in its “proprietary” capacity as the provider of municipal utility services and a municipality’s actions in its “governmental” capacity can affect cost allocation. In Milwaukee Electric Railway and Light Co. v. City of Milwaukee, 209 Wis. 656 (1932), the Court considered a case where the City proposed to install water mains under a street as the operator of a municipal waterworks system and required a public utility to move underground utility wires at the utility’s own expense. The public utility’s predecessor had received a franchise from the City many years earlier, allowing the utility to use street right-of-way. This franchise did not impose any requirement that the utility relocate its facilities at its own expense if they ever interfered with a municipal improvement. The Court noted the lack of any “relocation” requirement in the original franchise. It also noted that the City had never enacted any general ordinances to force public utilities to relocate facilities in municipal rights-of-way if they interfered with municipal improvements.

Given the lack of any such restrictions in the utility franchise or in a municipal ordinance, the Court considered whether forcing the public utility to relocate at its own expense would be a legitimate exercise of the City’s police power. The Court ruled that the waterworks system was being operated by the City in its private, “proprietary” capacity and therefore the City’s laying of additional water mains was not an exercise of police powers.

For these reasons, the Court held that the City could not require the public utility to move its underground lines at the utility’s own expense.

The answer to your question as to who might have to pay for the costs to move infrastructure as part of this Streetcar Project will depend upon the specific facts, circumstances, and applicable law briefly summarized above. Please note that the Commission has not, at this time, undertaken an analysis of any Milwaukee ordinances that might be applicable.
If a court determines that the City is requiring the relocation of facilities within its right-of-way in its “proprietary capacity,” then under the 1932 Wisconsin Supreme Court case noted above, the City could be required to pay for the relocation. Alternatively, if it is determined that the City does not have “an adequate health, safety, or public welfare justification” for requiring the relocation of the facilities, then the City may also have an obligation to pay for relocation per Wis. Adm. Code § PSC 130.09(1).

If the cost of moving utility facilities is found to be the obligation of the utility, such costs would likely be recoverable through rates for service to customers throughout the utilities’ entire service territory.

The legal requirements for reimbursement are not clear cut and could result in disputes. The Commission understands that AT&T, WEPCO and ATC have not yet developed a firm position on cost responsibility. The Commission has not been formally requested to address who has the obligation to pay for any required relocation of utility infrastructure. As a result, this letter and my preliminary opinion expressed below are not the Commission’s decision on the complicated issue as to who may have to pay relocation costs and do not bind how the Commission may ultimately decide the issue if and when a formal request for Commission action is made. If and when the Commission is asked to reach a decision on this or other aspects of the project, it will be based upon the formal record developed as part of the Commission’s proceeding or investigation. The Commission’s authority to resolve disputes as to cost responsibility for moving utility facilities is addressed in response to your third question.

Based upon the limited information obtained and analysis conducted to date, in my opinion it is likely that the Streetcar Project will probably involve the permanent relocation of some utility facilities thereby triggering the cost allocation provision of Wis. Admin. Code § PSC 130.09(1). At this time, it does not appear that the City has identified an “adequate health, safety, or public welfare justification” for the Streetcar Project and therefore the utility (and its ratepayers) would not be obligated to pay for it. Rather, the project appears to be proposed by the City in its “proprietary” capacity and not in the exercise of its police powers and the costs should likely be borne by the City.

3) What jurisdiction does the Commission have over this project: Specifically, what aspects of the proposed streetcar line would have to come to the Commission for approval, and what is the process for that approval?
The Honorable Wanggaard
The Honorable Vukmir
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The statutory provisions that appear to grant the Commission authority to resolve disputes of this nature include:

- Wisconsin Stat. § 196.26 establishes a method for the City to bring a complaint if it is not satisfied with a utility’s action. This statute allows the Commission to impose a remedy where “any rate, toll, charge, or schedule, joint rate, regulation, measurement, act, or practice relating to the provision of heat, light, water, or power is unreasonable, inadequate, unjustly discriminatory, or cannot be obtained.”

- Wisconsin Stat. § 196.58 allows a utility to bring a complaint to the Commission if a municipality sets unreasonable terms and conditions “upon which the public utility may be permitted to occupy the streets, highways or other public places within the municipality.” Wisconsin Admin. Code ch. PSC 130 contains Commission rules for administering this statute.

- Wisconsin Stat. § 227.41 allows the Commission to issue a declaratory ruling if a petition is filed by an interested person regarding whether a utility would be obligated to pay for moving its facilities associated with the Streetcar Project. Here, an affected utility or a ratepayer could request a declaratory ruling.

Thus, the Streetcar Project may come to the Commission under any of the above scenarios for dispute resolution if the affected utilities are unable to reach agreement with the City.

Another likely way the Commission could address this issue is that WEPCO and ATC may need the Commission’s approval under Wis. Stat. § 196.49, if the cost to relocate their facilities triggers the need for a Certificate of Authority under Wis. Admin. Code ch. PSC 112 (for electric construction), ch. PSC 140 (for steam construction), or ch. PSC 133 (for natural gas construction). Currently, electric construction projects of WEPCO or ATC that cost more than $8.25 million require Commission approval. For WEPCO, steam construction projects that cost more than $1.1 million and natural gas construction projects that cost more than $1.5 million require Commission approval. Under these rules, electric transmission (not distribution) and natural gas construction projects that are required because of highway construction do not need the Commission’s approval.

Costs incurred by WEPCO could become an issue in a rate proceeding, at which time the Commission would determine whether ratepayers should bear WEPCO’s related costs. This would likely not be the case for ATC, whose rates are set by the Federal Energy Regulatory Commission, nor for AT&T, whose rates are market-based and not regulated or set by the Commission.
Finally the Commission could also open a summary investigation on its own motion under Wis. Stat. § 196.28 to determine whether the affected utilities or the City should bear the cost of moving utility facilities.

4) Does the Commission have the authority and means to prevent non-Milwaukee residents from financing the proposed Milwaukee streetcar line? If not, what legislation would be required? If so, what steps must be taken to ensure that my constituents are not picking up the tab for a transportation system that few, if any, of them will ever use?

I believe the Commission has sufficient statutory authority, as explained in 3) above, to address the issue but, at this time, I am not in a position to comment on possible outcomes. If and when the issue is presented to the Commission for a decision in any of the ways outlined above, the Commission will then be able to address the question of cost responsibility for moving or modifying utility facilities.

I hope you find this information helpful. Please let me know if you have further questions.

Sincerely,

[Signature]

Cynthia Smith
General Counsel

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