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**CLERK OF SUPREME COURT
OF WISCONSIN**

**SUPREME COURT OF WISCONSIN
Appeal No. 2021 AP 1321-LV
Appeal No. 2021 AP 1325
Circuit Court Case No. 2019 CV 3418**

COUNTY OF DANE, et al.,

Petitioners,

v.

PUBLIC SERVICE COMMISSION, et al.

Respondents.

STATE OF WISCONSIN, ex rel. MICHAEL HUEBSCH,

Petitioner,

v.

THE HONORABLE JACOB B. FROST,

Respondent.

**ON APPEAL FROM THE CIRCUIT COURT OF DANE
COUNTY HONORABLE JACOB FROST, PRESIDING**

**MOTION OF ORGANIZATION OF MISO STATES, INC.
FOR LEAVE TO FILE A NON-PARTY BRIEF**

Benjamin B. Sloan*
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*Application to appear *pro hac vice* forthcoming

Counsel for Amicus Curiae,
Organization of MISO States, Inc.

Pursuant to Wis. Stat. Rule 809.19(7), Organization of MISO States, Inc. (“OMS”), hereby moves for leave to file a non-party brief.

In support of this motion, it states as follows:

1. OMS is foreign entity registered with the Wisconsin Department of Financial Institutions and was established to represent the collective interests of state and local utility regulators in the Midcontinent Independent System Operator (“MISO”) region and facilitate informed and efficient participation in related issues. Since its founding in 2003, OMS members collaborate to share information and resources, debate and exchange ideas on policy issues, and communicate their viewpoints across 15 states and the Canadian province of Manitoba.
2. OMS and its members have a strong interest in this case. Although this case arises in an appeal of a decision of the Public Service Commission, the Court’s resolution of this case could have a significant and widespread impact on various regulatory agencies in the state of Wisconsin, and on the way

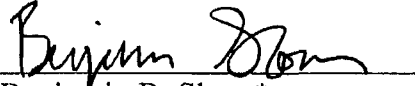
in which administrative agency decisions may be challenged going forward.

3. OMS has significant experience with the issues underlying this case and is uniquely positioned to provide additional context and practical perspectives to the Court in this case from the perspective of retail regulators across the Midwest and South. A brief from OMS will be helpful to the Court in explaining the broad public policy consequences at stake in this petition.

WHEREFORE, the Organization of MISO States, Inc. respectfully asks this Court to grant its motion for leave to file a brief as *amicus curiae*.

Dated this 1 day of December, 2021.

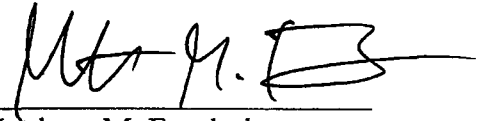
Respectfully submitted,



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CERTIFICATE OF SERVICE

A copy of this notice is being served upon all parties via first-class mail.

Dated this 1st day of December, 2021.

CRAMER, MULTHAUF & HAMMES, LLP,
Attorneys for Organization of MISO States, Inc.,

BY: 

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December 1, 2021

VIA HAND DELIVERY

Wisconsin Supreme Court
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P.O. Box 1688
Madison, Wisconsin 53701-1688

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CLERK OF SUPREME COURT
OF WISCONSIN

Re: *County of Dane, et al. v. Public Service Commission, et al.*
Dane County Circuit Court Case No. 2019CV3418
Appeal Nos: 21-AP-1321-LV & 21-AP-1325

Dear Clerk:

Enclosed for filing are 10 copies of a motion for leave to file an amicus brief and 22 copies of a proposed amicus brief on behalf Organization of MISO States, Inc. relative to the above-captioned matter.

By copy of this correspondence all counsel of record is receiving three (3) copies of the enclosed filings via U.S. Mail. Thank you for your attention regarding this matter.

Sincerely,

/s/ Matthew M. Fernholz

Matthew M. Fernholz

MMF:tlm

Enclosures

c: All Counsel of Record