



February 17, 2009

John Shenot, Policy Advisor
Commissioners' Office
Public Service Commission
P.O. Box 7854
Madison, WI 53707-7854

RE: **Investigation on the Commission's Own Motion Regarding Advanced Renewable
Tariff Development; 05-EI-148**

Dear Mr. Shenot:

WPPI Energy (WPPI) reviewed the questions issued by the Commission on January 16, 2009. Rather than comment on specific questions, WPPI believes it can provide more effective input to the Commission by limiting its comments to a number of general observations based upon its experience with distributed renewable resources. WPPI reserves the right to supplement these comments as necessary in the future.

WPPI believes that while these distributed renewable technologies are not cost effective when compared to utility scale renewable projects, the development of distributed renewable resources nevertheless is valuable as a means to accelerate installations, increase the diversity of renewable resources, and gain a better understanding of emerging technologies. The development of distributed renewable projects may even reduce installation costs.

We therefore believe the Commission should encourage and facilitate the development of distributed projects. WPPI believes the development of projects is best achieved by programs that are simple, straightforward, easily understood and predictable. Consumers need such characteristics if they are to successfully understand, use and finance the development of such projects.

Finally, WPPI desires to emphasize that as a not-for-profit electric power company with members which also operate on a not-for-profit model, our business model, interests and incentives in developing distributed renewable projects may not always coincide with those of other utilities in the state. A decision to structure tariffs and programs a certain way for investor-owned utilities may or may not make sense for a public power entity like WPPI. WPPI therefore urges the Commission not to develop a "one size fits all" template for distributed renewable projects.

Respectfully submitted,

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