



**Wisconsin
Electric
Cooperative
Association**

131 West Wilson Street, Suite 400
Madison, WI 53703-3269
608-258-4400
fax 608-258-4407
www.weca.coop

Public Service Commission of Wisconsin
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February 16, 2009

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

RE: Investigation on the Commission's Own Motion Regarding Advanced Renewable Tariff Developments, Docket No. 5-EI-148.

Dear Mr. Shenot:

We represent the Wisconsin Electric Cooperative Association (WECA) in connection with the above-referenced docket opened to examine whether and how to expand the availability of advanced renewable tariffs in Wisconsin and to promote greater uniformity in the ART's offered by Wisconsin electric utilities.

The WECA provides representation and services for all 24 not-for-profit Wisconsin electric distribution cooperatives serving approximately 267,000 consumers of electricity. Because electric cooperative rates are set by their member-elected boards of directors, co-op rates are not regulated by the PSC. We are concerned that any PSC rule making on ART's could be perceived as altering this process.

Uniquely, our member owners are in the position to be greatly impacted by an advanced renewable tariff designed to allow small customer-owned distributed generated projects to be profitable. In the case of the electric distribution cooperatives, the burden of the increased cost would be shared by a very small customer base.

Since cooperatives serve areas with the greatest potential for small scale renewable energy production, but also have the smallest customer base to share the cost, funding renewable projects with a set tariff at the utility level would create an imbalance between ratepayers. Since all users of electricity would benefit from availability of renewable energy, consideration should be given to provide for equal cost sharing measures.

In addition, any consideration of an advanced renewable tariff should take into account the additional benefits the customer-owned distributed generation project provides its owner. For example, a methane digester provides odor control, manure management, and byproducts such as bedding and fertilizer.

Also, there may be additional cost to upgrade distribution and/or transmission systems to safely interconnect customer-owned generation.

WECA appreciates the opportunity to submit comments in this docket. At this time WECA intends to monitor the investigation and reserves the right to file comments in the future or to otherwise participate in the docket. WECA requests that the following persons be included for WECA on the service list or distribution list to be developed for this docket:

Share A. Brandt
WECA Division Manager &
Cooperative Network Vice President
Cooperative Network
131 West Wilson Street, Suite 400
Madison, Wisconsin 53703
TEL: (608) 258-4409
FAX: (608) 258-4407
e-mail:
share.brandt@cooperativenetwork.coop

Beata Kalies
WECA Director of Government Affairs
Cooperative Network
131 West Wilson Street, Suite 400
Madison, Wisconsin 53703
TEL: (608) 258-4406
FAX: (608) 258-4407
e-mail:
beata.kalies@cooperativenetwork.coop

Thank you.

Sincerely,



Share A. Brandt, Manager
Wisconsin Electric Cooperative Association

cc: Beata Kalies