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Mr. 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:

In lieu of individual answers to each of the questions posed by the Commission in this docket, please accept this letter from Municipal Electric Utilities of Wisconsin commenting on the subject matter in general from a public power perspective. In addition, MEUW supports the comments and recommendations contained in WPPI Energy's filing in this docket.

Currently we are unaware of any renewable "buy back" tariffs being used by MEUW Member Utilities. However, we recognize the increasing pressure for alternative methods of meeting electric load demands of all sectors of customers. Distributed generation projects are one of many ways that load demand can be met.

We believe the Wisconsin Distributed Resources Collaborative's ongoing discussion with stakeholders is a positive action. We do however caution against applying one tariff to all forms and sizes of distributed generation. Such a tariff would handcuff local utilities and commissions; grouping them together with large investor owned utilities that may be able to absorb higher buy back rates more easily than a smaller municipal utility.

In summary, MEUW supports the Commission's efforts to further investigate the proper level of regulation and oversight of renewable buy back tariffs, and cautions against applying one solution for all forms and sizes of utilities in Wisconsin.

Sincerely,

David J. Benforado
Executive Director