

There is a problem with this website's security certificate.

The security certificate presented by this website was not issued by a trusted certificate authority. Security certificate problems may indicate an attempt to fool you or intercept any data you send to the server.

We recommend that you close this webpage and do not continue to this website.

[Click here to close this webpage.](#)

[Continue to this website \(not recommended\).](#)

Dear John, This is what I get (above) when I enter your web site. I am sorry but I wonder how many others get the same and have not sent in comments. This may be generated by my software but something is triggering it. The following are my two cents worth. Thank you so much for allowing me to comment. This is so timely and urgent for our nation. Sincerely, Monte Lamer, Biomass Solution LLC, 3633 Associates Way, Middleton, WI 53562

#### Public Comment on Advanced Renewable Tariffs in Wisconsin

- 1) A through E- Does Not Apply
- 2) Experience outside Wisconsin should take us to Europe who seems to be 10 years ahead of us. For example Germany has over 3000 digesters and the larger percentage of them are privately operated and agricultural units fed with waste from the farm or food production. Now there are many PV arrays installed on buildings, private and public, and many villages have 3 to 6 commercial wind turbines. This development did not just happen. It took some governmental encouragement and creating a safe investment climate for the builders.
- 3) What is the cost of the typical customer to construct or install is really not the right questions for this format. It is like asking what will it cost WE Energies to build a nuclear plant today. One would have to know some details. Where is it to be built? How many MW? Will the install be a CHP and the waste heat be used for other local industries? Every installation differs by dozens of external variables such as distances from the grid or a substation, voltage or how the energy is to be utilized. What type of PV panel is it? For example landfill gas is cheaper to develop if you are going to use it to heat a shop or a factory or a swimming pool then if you want to produce electricity with a combustion turbine or genset or if you want to fuel a fleet of refuse trucks with the pressurized gas. You left a spot for other technologies which could be, Geothermal, Solar hot water, Solar hot air and Fischer-Tropsch, which can take syngas and produce liquid fuels as the Germans and the Japanese did in WWII.
- 4) This is another odd question for this format. Asking how much energy can be produced by a typical customer owned system is like asking how much energy can a typical power plant produce. Power plants come in many sizes. Our national utilities tend to continue to build them larger to keep costs down even though these large energy factories are not efficient. Thousands of BTUs are lost in the cooling towers and the boiler stacks. Europe builds smaller power plants and uses the waste energy as a by product to heat factories, towns and to produce steam for industry as well as cooling. It is like our farms in Wisconsin, our milking herds continue to grow in size but this doesn't make them better. A renewable energy system should be built in a sustainable way. Today it doesn't make since to build a home PV array making more power then what may be used by the home. You ask

about useful life for these technologies. It can be as long as 20 to 30 years much like the life of a power plant asset of today. Take a PV system. There are no moving parts. Panels are warranted for 20 years at which their efficiencies slowly lessen. As a commission you should know these numbers and an opinion can not lessen or increase this statistic. The Commission could look at any installed technology. How long has as a Wisconsin hydro facility been used to produce power? Landfill gas lasts as long as the dump produces gas. Maybe ten years, maybe 15. Solar hot air lasts as long as the building stands. There are no moving parts.

- 5) A.) Goals and objectives of an ART are to increase diversity, decentralize utility production, while installing a sustainable infrastructure that produces renewable energy that reduces green house gasses.
- B.) The success of ART policy will be visible in that, systems will sprout allover. If the incentive is driving the capital investment in renewable energy whether electrical generation or thermo you will see it in every way. If ART fails or is not successful, things will continue as they are today, creating a society whose economic future is at the mercy of global energy costs and competitions. Today people can not pay their mortgages, while tomorrow people may not be able to pay their utility bills.
- C.) The commission should establish ART for all utilities even rural electric coops. If they sell energy here they should be reaching for our common goals.
- D.) The role of a customer-owned renewable installation should have nothing to do with the utility nor with its obligation to meet the RPS. The lowest possible price should seldom be the factor for a utility reaching to meet the RPS. These decisions are long term values that can not be looked at from the frame work we have learned to understand today's energy, fore tomorrow has changed, and we need to change our premise to make sure what we build has a positive, sustaining impact to our communities.
- E.) The best structure to incentivize reduced greenhouse gases is to step in the true cost of the fuel or the impact it has on the system and the environment. There could be a tax paid by the utility that is used to pass on to others installing green equipment. Or the utility could have the opportunity to pay the tax so someone else could develop the renewable resource or the utility could just build the resource in trade for the tax.
- 6) ART should target new generation.
- B.) To prevent under compensation or over payment is a difficult thing. A developer or producer needs to pay for his or her investment plus a profit. Sometimes producers over charge to make sure in the lean times they can economically endure. One way to help a producer is to include inflation increases or price escalators connected or triggered by the utility request to the commission for price increases. Or perhaps it could be gauged by the CPI. One thing is fore sure, when a utility gets a rate increase, these needs to automatically be pasted on as a rate increase to the producer of the renewable energy. For a farmer to agree to sell his digester KWH for 9 cents and then the utility wins to raise their rates by 5 percent, then the farmer should automatically be able to get a 5 % increase in what he is paid by the utility.
- D.) This is another strange question to ask about renewable energy. This is the question you should be asking about conventional fuels like natural gas, coal and oil. Long term forecasting of present facilities are a guessing game because of fuel pricing is in flux and will continue to be and is dependent on world competition, or increase cost of environmental degradation. Renewables are very predictable in that the fuel is seldom part of the risk or cost to operate such a system. Who wrote this questionnaire? The receipt of Federal or state incentives, like Focus, should have no bearing on the ART. It is difficult enough to encourage renewable energy

**and the construction or development, much less with the competition with the utilities, you will need every incentive you can muster. We only have so much time to accomplish so much work.**

**7) Legal issues I believe are there if you create them.**

**B.) ACT's effects on jobs, fossil fuel imports and agriculture are huge and tremendously positive for a state like Wisconsin. Think about electric generation that does not wait for the coal train to come from WY or MT. Think about the farmers that have and are throwing KWHs on their fields with no thought of the Mega Watts we have lost as consumers and they have lost as producers. Think about the farmer getting a milk check along with a power check. You have created a strong farmer, and the money stays here in Wisconsin. That is how powerful your decision on the ACT is and the impact it will have on us all.**

**C.) The utilities may allow a customer to choose one technology over the other, but I think we are making more of this than we need. Let us not complicate it.**

**8) Keep the tariff structure simple, offer a price whether it is a premium or fixed price doesn't matter as long as the price structure allows the builder to regain his investment plus a reasonable profit. The ART needs to be high enough to encourage rapid deployment. As long as the producer is compensated, I really don't think they will care if it is Fixed rate or premium as long as they can be comfortable with the risk.**

**9) Why would the commission want to limit the size or specific technology. One isn't better than another, even from a production point of view. We need to capture as many renewable opportunities as we can. Do not discourage this development by limits to capacity or technology, generation or cost. In many cases a couple technologies may work in the same application, but because of other constraints it is important to give the builder flexibility. Also, enrollment should be open to all 12 months a year. It takes months to develop a project and if you miss a monthly deadline you are out until the next go round. If you want to hamper or slow deployment then impose limits.**

**10) The wonderful thing about renewable energy is they all don't fit in the same place. SO you need to have the opportunity to have a choice of a couple. Please do not value one over the other. Accept them for what they are worth. The commission does not value a power companies generation options nor does the commission penalize the utility for building one type of plant against another. ART technology needs to have a generic definition that gives the user as well as the installer the most options.**

**11) Nor should there be any limits on size for any technology. The best measurement is KW's. Allow the ART to use that as its guideline or uniform measurement. Any project with any KW.**

**12) Yes the utility should offer the same contract for all types of technology and the duration needs to cover the pay back plus profit. It could be ten years or 15.**

**13) Cost recovery should be spread across all utility rates by all customers, those using and those not. The cost has to come from some where. It is appropriate to recover these costs with the rate payers. The commission needs to draft the uniform approach.**

**14) Renewable Attributes should be consistent across all ART's in Wisconsin, while pricing should not be dependent on which party owns the renewable or attribute. Attributes should be required to stay with the owner of the facility. This value may one day be the only monetary**

reward for the developer can claim after the weather wear or depreciation of the equipment. If the developer sells his wind farm these credits need to stay with the structure and the owner. For a utility to come in to a deal where a farmer has expressed he wants to install a digester, what right does a utility have to demanding they get the credits. It is not their farm, nor their manure, nor did they buy the generator. Who are they to steel the water rights or the green credits? If a utility wants the green credits then let them buy a dairy herd and build a digester.

- 15) No price differential is needed based on design criteria, unless someone is promoting certain efficiencies or size development. I would hate to see a small developer being set back because their project isn't as big as another. I am not sure to speak on the auction or tender base system. You could do a trial for 12 months to see the effect. The pricing needs to provide a decent return on investment. What is the return for a utility building and operating a coal plant that runs for 30 years or a hydro damn that was built in 1904 and still producing power today? Are these returns monitored or controlled or limited by anyone? No and neither should renewable assets.
- e.) Again pricing should be simple and across the board offering a blended price.
  - f.) Inflation escalators are critical in the success of any ACT program while helping to keep risk low for the developer and the rate payer.
  - g.) I see no advantage for a utility to offer different contract duration. I would expect they should want to be the same all around.
  - h.) There should be no price cap or measurements for profits or losses. Set the price and move on. The cost of the renewable generation will blend into rate structure of the old infrastructure. The new equipment will not be erected fast as it is impossible to build a lot fast. A digester can take 6 to 12 months to build and come on line.
  - i.) Don't mess with the pricing of the tariff to reflect maturation of technologies. No- set the rate and go on, with the price connected to CPI and Utility rate increases escalators. Perhaps a place to set the price could have nothing to do with avoided cost, but new cost. Perhaps the accepted cost should be what it will cost the utility to build the most recent plant and then some.
  - j.) The most efficient energy production is CHP where the waste heat is captured and used by another industry. Most often CHP is not renewable but can be when you are talking biogas. But maybe the tariff should encourage this production especially in a paper mill or a food factory like Del Monte or Seneca where power is used with lot of steam or cooling needs.

16 There are a couple of things we need to sort out. The utility industry, whether they want to do this or not can be a bottleneck. To give you an example, many of the farm digesters receive incentives from the state Focus program or the USDA program and these moneys are given on condition that they are used by a certain date. There are times the utility uses this to force a farmer to signing the power purchase contract which is often in the utilities favor. Sometime the farmer may even have to start his project before he has a contract from the utility. This is not right. Also a farmer building a digester had told me, he was told by the utility representative, that they would not give him a purchase price for his power, until they had a copy of the purchase order or receipt for the generator and switch gear that he was going to order for his install. He expressed to me he had no, intentions of ordering any equipment until he understood the rate his power was worth.

Depending how we handle our renewable blend in, with conventional fuels and production of energy, will determine how competitive and affordable our children or the next generation will have things. We need to think long term.

Today, we need to become thrifty, resourceful and we need to use every resource at hand. For example, our paper mills are fight to stay alive. The last thing a utility wants is to lose a papermills. SO the utility must help and become a partner. Let the paper mill produce biomass

**electricity for a profit or retail value, sell it to the utility. Now the mill is stronger and it has a second product to sell. This new opportunity may be the only thing that allows us to preserve this infrastructure until we develop the bio refinery it can become.**

**Perhaps there should be people hired by the utilities to find waste that can be converted into energy. The price of the known waste may be more stable than the price of conventional fuel. Perhaps this is something the state could incentivize for the utilities.**

**Thank You. Monte Lamer**