



June 15, 2009

To: Robert Norcross, Administrator, Gas and Energy Division, Public Service Commission
John Shenot, Policy Advisor, Public Service Commission

From: Wisconsin Energy Conservation Corporation

Re: Investigation on the Commission's Own Motion Regarding Advanced Renewable Tariff Development (5-EI-148)

Wisconsin Energy Conservation Corporation is pleased to submit input on two of the six questions developed by Commission staff in the May 20, 2009 Briefing Memorandum. We appreciate this opportunity to participate in a dialogue regarding these critical issues and we look forward to participating in subsequent discussions about these important issues.

Below are the Commission's staff questions, followed by (in italics) the WECC response. If you have questions or need clarification regarding any of these responses, please contact Don Wichert.

- **Issue One: Should the Commission expand the availability and use of ARTs in Wisconsin?**

WECC believes that ART's are a necessary, but not unilateral solution, to accelerate the adoption of distributed renewable energy resources in Wisconsin. We agree that ARTs are part of a holistic solution, and need to be supported as one of the options that customers can chose to make a renewable energy adoption decision. Further, as the Administrator for Wisconsin's Focus on Energy program we see the very real advantages of program consistency across utility territories. When offerings are consistent vendors are more likely to promote these offers and customer confusion is minimized.

Accordingly, WECC believes the most appropriate alternative is that the Commission order all investor-owned utilities larger than a specified size to offer ARTs consistent with Commission decisions. Municipals and smaller IOU's would retain the right to request approval of ARTs on a case by case basis.

This alternative provides the most consistency over the major IOU's and gives flexibility to the smaller IOU's and Muni's without having a major impact on rates.

- **Issue Two: Should the Commission require uniformity in the ARTs offered by the Wisconsin electric utilities?**

As noted above, WECC believes statewide consistency is an important principle for any variety of efficiency and renewable energy offerings, including ARTs. So here, too, we support uniformity insofar as it is practical and can be implemented in ways that minimize rate impacts.

WECC believes that most appropriate alternative is that all large utilities covered by the Commission's decision on Issue One must offer ART's for the same list of renewable technologies and the terms of ART contracts must be uniform across all large utilities. We believe small utilities covered by the Commission's decision on Issue One, if any, should offer ARTs for solar PV only and the terms of the ART contracts should be uniform across all small utilities. We also suggest that small utilities be allowed to offer ARTs for other technologies on a case by case basis as suggested in Issue One.

Once again,

This concludes WECC's comments on the Advanced Renewable Energy Tariff memorandum.