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Public Service Commission of Wisconsin
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June 15, 2009

Public Service Commission of Wisconsin
Attn.: John Shenot, Policy Advisor
610 N. Whitney Way, P.O. Box 7854
Madison, WI 53707-7854

Re: Advanced Renewable Tariff Development
Docket No. 5-EI-148

Dear Mr. Shenot:

I have been involved with wind development in Wisconsin for the past ten years and I have represented farm clients for more than thirty years. Based on these experiences, I have several pertinent comments regarding the recent Briefing Memorandum filed with the Commission.

First of all, it is my experience that the large investor owned utility in my part of the state (Wisconsin Electric Power Company) is unwilling to enter into power purchase agreements with local landowners for the purchase of electricity from utility scale wind installations. I have been consistently told that projects of this sort should use the customer owned generation rate which currently blends out at about 5.3¢ per kilowatt hour.

Obviously, the utility in question prefers owning its own generating capacity and is simply attempting to keep other producers out of its market share.

Landowner developed commercial scale wind energy can be fed directly into the distribution system of utilities thereby avoiding significant costs in the form of substations, transformers and the like which are otherwise necessary when developing larger wind farms which tie to the transmission system.

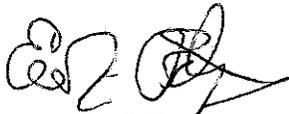
To date, there has simply been no market for utility scale wind energy produced by local landowners. Consequently, Wisconsin has no such installation. Please compare this to Minnesota which currently has 492 megawatts of installed capacity of this type.

There are other significant benefits to distributed commercial scale wind development which have not been addressed in your Briefing Memorandum. These include strengthening the distribution grid, avoiding transmission charges, reducing the need for additional expensive transmission lines, engendering more local support for wind projects and promoting local economic development.

I can understand the concern of utilities and ratepayers about costs involved with the development of wind energy with advanced renewable tariffs. However, to the extent that the proposed rates are not much greater than what the utilities themselves are paying for large wind farms and to the extent that other benefits accrue to the utilities and the ratepayers by injecting distributed wind power into the distribution grid, there is no reason to delay. A reasonable tariff should be established for small commercial scale wind projects as soon as possible.

Respectfully submitted,

RITGER LAW OFFICE

A handwritten signature in black ink, appearing to read 'EJR', with a stylized flourish extending to the right.

Edward J. Ritger

EJR/no