June 15, 2022

Cru Stubley, Secretary to the Commission
Public Service Commission of Wisconsin
4822 Madison Yards Way
North Tower - 6th Floor
Madison, WI 53705

Re: Verified Petition of Midwest Renewable Energy Association to Determine Applicability of Wis. Stat. §§ 196.01(5)(a), 196.02, 196.03, 196.49, 196.491(5), 196.495(1m) and (5) to Third-Party Financed Distributed Energy Resource Systems. Docket Number 9300-DR-105.


Dear Mr. Stubley and Commissioners of the Public Service Commission:

The Wisconsin Electric Cooperative Association (WECA) provides government relations, member education, and media services for its membership of 24 electric distribution co-ops, one generation and transmission cooperative (Dairyland Power Cooperative), and their nearly 600,000 member-owners. With nearly 10% of electric consumers being electric cooperative members – more than 263,500 farms, residences, and businesses - we predominantly serve the state’s rural areas where on average, household income trails the state average by 11.4%, yet, collectively, electric cooperatives produce more solar power than any other state utility.

Because electric cooperatives are self-governed by elected, consumer-member boards, rather than the Public Service Commission, it is quite uncommon for WECA to comment on dockets that are before the Commission. Because of the policy implications of Docket Number 9300-DR-105 and Docket Number 9300-DR-106, WECA respectfully asks the Commission to decline issuing a declaratory ruling in both cases, as they have done many times before when the issue has come before the Commission.

We believe it is incumbent that any changes of this magnitude to statutes and/or administrative code must be deliberated and implemented by the Legislature. As an entity that exists to protect the interests of our consumer members, a well-regulated utility system should provide safe, reliable, and affordable electricity equitably to ALL members. These petitions fail to provide a clear and convincing argument for the Commission to alter significant energy policy in the state that should, and must, be reserved for the Legislature.

Again, WECA respectfully asks that the Commission decline to issue of declaratory ruling on Docket Number 9300-DR-105 and Docket Number 9300-DR-106.

Sincerely,

Steve Freese, President and CEO
Wisconsin Electric Cooperative Association