

BEFORE THE
PUBLIC SERVICE COMMISSION OF WISCONSIN

DOCKET #9300-DR-104

**JOINT COMMENTS OF THE SUSTAINABILITY OFFICERS OF THE
CITY OF GREEN BAY, DANE COUNTY, CITY OF EAU CLAIRE, CITY OF MADISON,
CITY OF RACINE, MILWAUKEE COUNTY, AND CITY OF LA CROSSE**

On February 1, 2021, the Public Service Commission of Wisconsin (“PSCW”; “Commission”) issued a request for public comments regarding docket 9300-DR-104 (PSC Ref#: 404042). Accordingly, on behalf of the above-referenced local governments, we respectfully submit these joint comments on the proceeding.

As local government sustainability officers, we strongly support measures that help to make renewable energy more accessible and affordable to Wisconsin residents and businesses. Transitioning from fossil fuels to renewables like wind and solar helps to create family-supporting jobs, while protecting natural resources, mitigating climate change impacts, and safeguarding public health. Moreover, “going renewable” is critical to achieving Governor Evers’ goal of 100 percent carbon-free electricity by 2050.

For these reasons, we support a variety of third-party ownership arrangements such as the Solar Services Agreement between Eagle Point and the City of Milwaukee. These well-established financing models enable utility customers to install renewable energy systems at little or no upfront cost, with owners/developers responsible for system operations and maintenance. These advantages appeal to owners of residential and commercial buildings who would like to obtain solar PV systems to achieve their energy and sustainability goals.

We urge the PSCW to take this opportunity to clarify Wisconsin policy around third-party ownership of renewable energy projects. In our view, allowing third-party financing statewide will accelerate renewable energy development in Wisconsin. In neighboring states such as Illinois, Iowa, and Michigan, third-party financing has helped to fuel significant growth in the solar energy industry, while increasing access to clean, affordable, and locally produced energy.

Collectively, we hope the PSCW will determine that third-party financing of solar systems does not make the owner/developer a “public utility”, and that the method in which a system is financed should not be a consideration for utilities in reviewing interconnection requests. We also encourage the Commission and WEPCO to allow the City of Milwaukee’s proposed systems to be interconnected. Connecting these systems gets us one step closer to the clean energy future envisioned by Governor Evers and by our respective communities.

Thanks very much for considering our comments.

Dated the 23rd of February 2021.

*/s/ Melissa M. Schmitz
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City of Green Bay*

*/s/ Cara Pratt
Sustainability and Conservation Coordinator
City of Racine*

*/s/ Kathy Kuntz
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