

**BEFORE THE
PUBLIC SERVICE COMMISSION OF WISCONSIN**

Focus on Energy Quadrennial Planning Process IV

5-FE-104

COMMENTS FROM THE FOLLOWING

**WISCONSIN LOCAL GOVERNMENT CLIMATE COALITION MEMBERS:
CITY OF EAU CLAIRE, CITY OF GREEN BAY, CITY OF LA CROSSE, CITY OF MADISON,
CITY OF MIDDLETON, CITY OF MILWAUKEE, CITY OF STEVENS POINT, CITY OF
WAUSAU, DANE COUNTY,
EAU CLAIRE COUNTY, MILWAUKEE COUNTY, VILLAGE OF MCFARLAND**

Members of the Wisconsin Local Government Climate Coalition (WLGCC, wlgcc.org) are pleased to provide these comments in response to the March 24, 2023 memorandum in the docket 5-FE-104, the Focus on Energy Quadrennial Planning Process IV proceeding.

Every WLGCC community has committed to substantial reductions in greenhouse gas emissions and increased resiliency against climate change. Energy efficiency, electrification and renewable energy projects are an important piece of our local efforts to achieve these goals and, as such, we all interact with Focus on Energy (Focus) regularly, both on projects specific to local government operations and on efforts to engage our broader communities in energy savings.

We were delighted to see the PSC staff memo regarding Focus on Energy's potential role in delivering the Inflation Reduction Act Home Efficiency and Electrification (IRA HER) programs. As local governments we understand the advantages associated with Wisconsin's statewide energy efficiency and renewable energy program. Unlike local governments in other states where different energy efficiency offers from different utilities can cause consumer confusion, we appreciate that Focus is the one-stop-shop for our residents.

More, we appreciate the decades of expertise behind the Focus on Energy program team. Focus staff are experts on energy efficient technologies and standards, cold-climate building science, trade ally practices and networks, and the broader adoption trends in our communities. Focus also has strong administrative systems, honed over years of program implementation. All of that expertise makes them uniquely qualified to deliver the federal rebate programs in parallel with Focus on Energy programs.

In our view there are substantial advantages to having Focus on Energy deliver the federal rebate programs. As staff noted in their memo, the federal rebates are well-aligned with the Commission's priorities for Focus on Energy during Quad IV, especially related to equity and emission reduction. Specifically, staff noted "A successful deployment of the IRA HER programs would be consistent with, and would help accelerate, these Commission priorities."

More, delivering the IRA HER programs via Focus will be the most efficient and cost-effective way to administer these funds. It will also be the most easy-to-understand approach for consumers and trade allies. And it will enable Wisconsin to get its IRA HER programs up and running quickly, which will benefit both residents and trade allies who are anxious to see these dollars in action.

We do recommend that Focus on Energy implement the HER programs wholly consistent with federal law and intent relative to energy efficiency and electrification, which should supersede any existing roadblocks relative to fuel switching and unregulated fuels.

Wisconsin is one of a minority of US states with a statewide energy efficiency and renewable energy program. Relative to the IRA HER programs, our statewide program is an advantage we have over the states that will have to create some statewide administrative structure for these funds. We urge the Commission to deploy these funds through Focus on Energy, taking advantage of our state's strong and effective infrastructure to optimize the benefits available to our residents and trade allies.

Again, we appreciate the opportunity to participate in this docket. WLGCC members consider Focus on Energy a key ally in our efforts to reduce emissions and build climate resilient communities.

Dated this 7th Day of April, 2023.

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