

To: Public Service Commission of Wisconsin

From: Able Energy	Integrated Energy Services
Appleton Solar	Legacy Solar
Arch Electric	MEP Associates
BIOFerm Energy Systems	Midwest Renewable Energy Association
Carl Siegrist Consulting LLC	Midwest Solar Power LLC
Carlson Electric LLC	Miron Construction
Chippewa Valley Affordable Energy	Next Step Energy
City of Milwaukee	Next Energy Solution
Citizens Utility Board	North Wind Renewable Energy, LLC
Clean Wisconsin	Photovoltaic Systems LLC
Convergence Energy LLC	RENEW Wisconsin, Inc.
Driftless Solar Inc.	RePower Madison
DVO Anaerobic Digesters	Sierra Club
Eland Electric Corp.	Sisters of St. Agnes
Energize LLC	SunPeak
Energy Concepts	SunVest Solar
Environmental Law & Policy Center	Synergy Renewable Systems LLC
Ethos Green Power	Unlimited Renewable Energies
Full Spectrum Solar	Wisconsin Council of Churches
Geothermal National and International Initiative	Wisconsin Geothermal Association
Hoeper Green Power	

Date: October 17, 2016

Re: Investigation into Improving Access to the Statewide Energy Efficiency and Renewable Resource Programs in Rural Wisconsin that are Underserved by Broadband Service Providers	5-FE-102
Quadrennial Planning Process II	5-FE-100

The entities submitting the joint comments below are Wisconsin businesses, organizations and full party intervenors to 5-FE-102 (hereinafter the "Joint Commenters") who support continued investment of Focus on Energy revenues into customer-sited renewable energy resources. We appreciate the opportunity to submit comments on the Commission Memorandum ("the Memo") dated October 6, 2016.

The comments herein address specifically the renewable energy incentive funding matters left open by the Commission from November 2014. Appended to this comment is a letter from RENEW Wisconsin to the Commission, dated August 25, 2016, which contains a discussion of Focus on Energy's renewable energy program as well as recommendations

for continued funding of the program's core renewable energy activities through the remainder of the 2015-2018 quadrennium.

Currently, and absent a Commission decision on this matter, there is no funding allocated to renewable energy incentives for 2017 and 2018. At its November 2014 decision meeting on Focus on Energy, the Commission decided to allocate two years' funding for renewable energy incentives, and left open the question of funding renewable energy incentives in 2017 and 2018 until now.

The discussion on page 30 of the Memo provides a strong rationale for continued investment into both the Renewable Energy Competitive Incentive Program (RECIP) for businesses and the Residential Rewards Program for residential customers. These core programs have been popular and effective since their inception, and have become principal drivers of the marketplaces in Wisconsin for biogas, geothermal, solar electric, solar hot water, and small wind systems.

After describing the savings accrued from the incentive programs in place for both business and residential customers, as well as the dollars spent in those categories, the section closes with this sentence:

"The 2016 program year is on pace to exceed spending compared to previous years, and the full incentive budget amount was committed as of late September 2016."

Based on the strong historic results of the Focus on Energy renewable energy incentive program, and their better-than-expected results in 2015 and 2016, there is a very strong case for continuing incentives through RECIP and Residential Rewards into 2017 and 2018.

Therefore the Joint Commenters recommend the following course of action for the Commission's consideration:

1. Allocate a minimum of \$10 million in Focus on Energy revenues (a minimum of \$5 million in 2017 and \$5 million in 2018) for renewable energy incentives. The allocated funds could come from a number of sources or a combination of sources, including annual program funds, unspent renewable energy revolving loan funds, and/or the other funding sources identified in the Memo.
2. Structure the annual renewable energy allocations along the lines delineated in RENEW Wisconsin's August 25th communication to the Commission, with \$3.5 million set aside for business customers and \$1.5 million for residential customers.
3. Regarding Commission alternatives on the Revolving Loan Fund – Program Design (page 34), we support Alternative 3.

4. Regarding Commission alternatives on the Revolving Loan Fund – Program Funding (page 35), we support Alternative 2.

The Joint Commenters thank you in advance for your consideration of our viewpoints.

/s/ Tyler Huebner
Executive Director
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Madison

/s/ Jesse Michalski
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Eland Electric Corp.
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/s/ Kurt Runzler
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/s/ Dan Walsdorf
President, Wisconsin Geothermal Ass'n
Owner, Advanced Custom Geothermal
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/s/ Teresa Lehman
Director of Sustainable Services
Miron Construction
Neenah

/s/ Peter Bakken
Coordinator for Public Policy
Wisconsin Council of Churches
Sun Prairie (HQ) and 2,000 congregations
statewide

/s/ Melissa VanOrnum
VP Marketing
DVO Anaerobic Digesters
Chilton

/s/ Nadeem Afghan
CEO
BIOFerm Energy Systems
Madison

/s/ Ryan Harkins
Project Manager
Synergy Renewable Systems, LLC
Stoughton

/s/ Kirk Kindred
National Sales Director
SunVest Solar Inc.
Pewaukee

/s/ Burke O'Neal
Project Engineer/Director
Full Spectrum Solar
Madison

/s/ Steve Johnson
Vice President, Business Development
Convergence Energy, LLC
Fontana

/s/ Alarik Rosenlund
Co-owner/Partner
Midwest Solar Power LLC
Madison

/s/ Michael Dearing
Principal
Driftless Solar, Inc.
Spring Green

/s/ Josh Stolzenburg
Chief Executive Officer
North Wind Renewable Energy
Stevens Point

/s/ Erick Shambarger
Environmental Sustainability Director
City of Milwaukee
Milwaukee

/s/Ingrid E. Nahm
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Appleton Solar
Appleton

/s/Carl Siegrist
Managing Director
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Hudson

/s/Ross DePaola
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/s/Chad Sorenson
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/s/Michael Harvey
Chief Executive Officer
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River Falls

/s/Steve Terwilliger
Convener
Chippewa Valley Affordable Energy
Eau Claire

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Photovoltaic Systems LLC
Amherst

/s/Peter Murphy
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/s/Ed Zinthefer
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/s/Foley Quinn
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/s/Dave Carlson
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Carlson Electric LLC
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/s/ Shane Hoeper
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Cuba City

/s/Trang Donovan
Manager
Unlimited Renewable Energies
Prairie du Sac

/s/Elizabeth Katt Reinders
Senior Representative, Beyond Coal Campaign
Sierra Club
Madison

/s/Keith Reopelle
Policy Director
Clean Wisconsin
Madison

/s/Andy Olsen
Senior Policy Advocate
Environmental Law & Policy Center
Madison

/s/Mitchell Brey
Campaign Director
RePower Madison
Madison

/s/Sister Susan Seeby and the Leadership Team
Leader
Congregation of Sisters of St. Agnes
Fond du Lac

/s/Jack DiEnna Jr.
Executive Director
Geothermal National and Int'l Initiative
Washington, DC

/s/ Michael Reuter
Ethos Green Power
Project Manager
Ethos Green Power
Viroqua

Map depicting businesses and organizations that have signed onto this letter of support, showcasing the geographic distribution of support for Focus on Energy renewable energy incentive funding of \$5 million per year in 2017 and 2018.

