



Wisconsin
Electric
Cooperative
Association

MEUW
Municipal Electric
Utilities of Wisconsin

DAIRYLAND POWER
COOPERATIVE
A Touchstone Energy® Cooperative

WPPI
ENERGY

To: Wisconsin Legislature

**From: Wisconsin Utilities Assn., WPPI Energy, Inc., MEUW,
Dairyland Power Co-operative & Wisconsin Electric Co-op Assn.**

Re: Please do not co-sponsor Community Solar

Date: July 15, 2021

On behalf of Wisconsin's energy providers, the Wisconsin Utilities Association, the Wisconsin Electric Cooperative Association, the Municipal Electric Utilities of Wisconsin, WPPI Energy Inc., and Dairyland Power Cooperative respectfully urge you not to co-sponsor LRB 1902/2 or similar legislation, regarding creating a Community Solar law.

As you may know, out-of-state "Community Solar" developers are seeking support for LRB 1902/2, which would shift significant costs to non-participating electric customers and give free access to Wisconsin's energy grid, at no risk to themselves. Under the bill, among other things:

- Out-of-state Community Solar developers are exempt from being regulated as public utilities;
- "Subscribers" would sign contracts to receive bill credits from their incumbent utility for up to 25 years;
- Wisconsin utilities would be required to carry over any excess bill credits "in perpetuity";
- Wisconsin utilities would be required to pay full retail rates to subscribers for any unused bill credits;
- The subscriber organization would retain the rights to all Renewable Energy Credits (RECs) generated by the facility; and
- Wisconsin utilities would be required to allow interconnection of the Community Solar facility to their electric distribution system.

Wisconsin utilities are already planning to add thousands of MW's of utility scale solar power and battery storage in the coming years, at far lower cost, directly benefitting Wisconsin's electric customers.

The bill would chiefly benefit the out-of-state Community Solar developers at the expense of the "non-subscribing" customers. Meanwhile, the out-of-state Community Solar developers would benefit from using the grid with no obligation to be a provider of last resort or maintain grid reliability, as Wisconsin's utilities are required to do. All of the reward with none of the risk.

Customers who subscribe will continue to be served by their utility while also receiving bill credits.

The higher the credits for subscribing customers, the greater the subsidy paid by non-subscribing customers. That is not fair.

On behalf of Wisconsin's energy providers, we respectfully urge policymakers to reject this proposal. Please do not co-sponsor LRB 1902 or similar Community Solar legislation.