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Tim Heinrich  
 Executive Director

October 22, 2018

FILED ELECTRONICALLY

Ms. Steffany Powell Coker  
 Public Service Commission of Wisconsin  
 P.O. Box 7854  
 Madison, WI 53701-7854

**RE: Application of Wisconsin Power and Light Company for  
 Credit Card and Late Payment Fee Tariff Revisions**

**Docket: 6680-TE-103**

Dear Secretary Coker:

This letter is submitted by Municipal Electric Utilities of Wisconsin (“MEUW”) in response to the Commission’s request for public comment in the above-referenced docket. MEUW members support Wisconsin Power and Light’s (“WPL”) position that it is reasonable to recover transaction fees to process credit card payments in rates.

MEUW members across Wisconsin have always made it easy and convenient for customers to pay monthly utility bills. A large majority of municipal electric utilities operate walk-in and/or drive-thru payment centers for the convenience of their customers. Some customers mail in payments or use electronic funds transfer. However, an increasing number of customers use credit cards to pay their utility bills. MEUW members believe it is important for our customers to have options, especially as more and more customers embrace the online economy.

WPL’s proposed tariff revision is a step in the right direction. MEUW supports the elimination of direct fees charged to customers for credit card payments. The Commission should allow public utilities to include the aggregate cost of these fees as rate-recovered operations and maintenance expense in recognition that customers’ behaviors are changing. Likewise, the proposal correctly acknowledges that costs associated with all other forms of customer payments are recovered through utility rates and, therefore, there should be no impediment to the Commission’s approving the aggregation of credit-card fees to enable customers who prefer to pay with a credit card to do so without incurring additional personal expense.

As WPL notes in its filing, regulators in other states already allow rate-recovery of aggregated credit-card fees. Utilities in those states experienced a corresponding increase in the number of customers paying by credit card. We believe Wisconsin utility customers will embrace the new fee-free option in a similar way. Indeed, many of our member utilities often receive negative feedback from customers when they are charged a “convenience fee” to pay with a credit card. This proposal would help to mitigate those customer complaints.

Please contact me directly with any questions Commission staff may have regarding these comments.

Sincerely,

A handwritten signature in black ink that reads "Tim Heinrich".

Tim Heinrich  
 Executive Director