



Cheq Bay Renewables

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Comment for the WI Public Service Commission

Oct. 18, 2022

Ref: PSC Docket No. 9300-DR-106, Vote Solar's Petition regarding the Family Project

The Family referenced in this docket would have a solar PV system, aka distributed energy resource (DER), installed on their property and interconnected behind the meter. *Ownership* of the DER is immaterial to public safety, the National Electric Code, economic or electrical effects on utility tariffs or interconnection requirements, nor should it require the intervention of the WI PSC. The DER will operate the same, no matter who owns the infrastructure.

The Family's *choice* is another consideration. What if the Family simply chooses to use their cash for another purpose? The result of a Third-party Financing (TPF) arrangement is to reduce upfront costs so limited capital can be used for the most advantageous personal benefit. Most investments come with a cost-benefit analysis or net present value analysis to guide this choice. Choice is a foundation of the American system. Why have DER's been singled out in WI as if they are a unique commodity limited to a monopolistic conceptualization? Making this choice, like ownership, does not affect public safety.

TPF offers DER's to low- or moderate-income families that have no other means to obtain them. *Equity* is inherent because other incentives like the Investment Tax Credit or Direct Pay don't apply to this demographic. Equity has risen in importance across all Federal and State decisions, and should be applied to TPF.

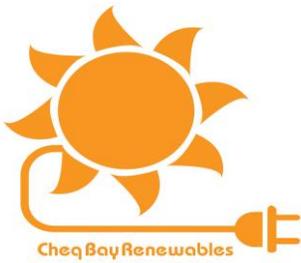
TPF is just another financing tool to allow a more rapid and equitable expansion of clean energy. As a tool it assists the state's Clean Energy Plan. It will help families lower energy bills and reduce reliance on out-of-state energy sources.

With the passage of the Inflation Reduction Act, the Federal Investment Tax Credit is stable for the next decade. Now it is even more important than ever to clarify the use of the TPF mechanism.

As an example of a successful TPF, the Bad River Tribe in Ashland County installed 3 microgrids and the largest battery storage system in WI in 2021 using TPF. They were able to do so because the utility, an electric cooperative, is not regulated by the PSC, and the Tribe, as a sovereign nation, is not subject to WI law. The system is a showcase of both the financial mechanism and technology used and would not have happened without TPF.

I understand that this docket is not about one family, but rather could set policy throughout the state. Cheq Bay Renewables is ready to support and protect our local area, especially the most vulnerable, from companies that might take advantage of TPF. We hold educational events and post

www.CheqBayRenewables.org



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examples of successful DER installations, including financial information. We are an independent, open-sourced resource to advance clean energy initiatives like TPF.

I encourage the WI PSC to approve Vote Solar's petition.

Sincerely,

William Bailey,
Cheq Bay Renewables, President