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**PSC REF#:** 395062

**Public Comment by Susan Millar on Behalf of 350 Madison Climate  
Action Team**

**Docket or Case Concern:** 5-ES-110

**Submission Date:** 08/09/2020 04:45:12

**Comment Detail:**

DATE: August 9, 2020

TO: Public Service Commission, Docket 5-ES-110 Comments

FROM: 350 Madison Climate Action Team

RE: Comments on the PSC's draft Strategic Energy Assessment 2026

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350 Madison thanks you for seeking public comment on your draft 2020-2026 Strategic Energy Assessment. In doing so, you are helping put the "public" back into the Public Service Commission.

350 Madison's mission is to mobilize people to take action on climate change and demand a rapid transition to a just and sustainable world powered by clean, renewable energy.

We begin our comment by considering the PSC's mission statement. We then briefly address the PSC's draft Strategic Energy Assessment 2026.

#### Opening Comments on the PSC's Currently Stated Mission

The PSC's current mission statement is to "oversee and facilitate the efficient and fair provision of quality utility services in Wisconsin." In our view, this statement suggests a "business as usual" situation, when we urgently need the PSC to take the lead in updating how our state generates and uses energy. We ask you to change this statement to convey that the PSC is using all of its powers to change electricity generation and use so that Wisconsin can once again become a national leader among the states, and achieve zero CO2 emissions as soon as possible.

Wisconsin's electricity generation and purchasing policies and procedures are neither as efficient nor as fair as they need to be. We consider these matters of efficiency and fairness separately.

The term "efficient" in your current mission statement implies "without undue or excessive cost and waste." We see both excessive cost and undue waste in the policies that regulate how Wisconsin's utility services currently are provided.

First, from a cost perspective, many reliable sources (e.g., <https://www.irena.org/publications/2020/Jun/Renewable-Power-Costs-in-2019>) have made clear that both solar and wind are more efficient by kW/h than coal, and Wisconsin is lagging behind most other states in developing these more efficient renewable energy sources. For data supporting this assertion, please see this page (<https://cityrenewables.org/state/wisconsin/>) in the "Local Government Renewables Action Tracker" website. It shows that Wisconsin ranks 29th out of all 50 states plus Washington, D.C. for the

percent of electricity sourced from renewables. (For example, Iowa ranks 1st, Minnesota ranks 7th, Illinois ranks 21st.)

Second, since we have no coal mines in the State of Wisconsin, all the coal that constitutes about 60% of our energy is shipped at additional expense into the state. This is an additional source of inefficiency and it also means we are not energy independent.

Third, Wisconsin's current energy conservation policies fail to meet today's standards for efficiency, which means they are unnecessarily wasteful. We learned from Slipstream's 08/05/2020 presentation to the Governor's Task Force on Climate Change's Energy, Housing and Infrastructure Subcommittee that Wisconsin's International Energy Conservation Code (IECC) is seriously outdated. According to follow-up provided by the Slipstream researcher:

"IECC 2015 is roughly equal to ASHRAE 90.1-2013. Wisconsin's commercial code is currently IECC 2015 plus amendments, which is similar to 90.1-2013 with amendments. [Regarding] those amendments, lobbyists in WI tend to add weakening amendments, so WI code is actually somewhat worse than 90.1-2013. The National Labs run some models [to decide] whether WI code is closer to the 2013 or the 2010 version. They've apparently decided 2010 for this version."

We now turn to the phrase "fair provision" in your statement. Fair provision implies that the PSC is doing all within its power to ensure that our citizens are not breathing harmful toxins and are able to make money-saving choices about how they purchase electricity and other sources of energy. However, citizens, especially those who live near coal plants, are breathing harmful toxins. And almost all of us must purchase our energy from privately owned energy monopolies. Moreover, our coal-fired plants continue to emit huge amounts of climate-warming CO<sub>2</sub>, which is not fair to our children, grandchildren, and great-grandchildren. So in these respects, our state's current electricity policies are not fair.

Wisconsin citizens of all political persuasions need a PSC that is driven to immediately implement cutting-edge energy generation and that rapidly adopts strategies that minimize GHG emissions (through increasing efficiency and the use of renewables) while maximizing economic justice for all our citizens. We therefore ask the PSC to develop and enact policies and strategies that decarbonize the provision of electricity in our state, and that provide citizens choice in how they purchase and use electricity.

Comments on the PSC's Draft SEA

We urge you to change your draft Strategic Energy Assessment 2026 so that it provides the information, guidance, and vision we need to meet the urgent energy generation and use challenges facing our state. Here are some examples of weaknesses in the draft with suggestions as to how these weaknesses can instead become strengths.

The draft acknowledges "environmental considerations" (e.g., on page 15, your document states, "deployment of natural gas and zero-carbon energy resources have been influenced by environmental considerations as well as declining prices"). Such language seriously understates the urgent atmospheric warming problems facing us. We ask that the SEA go beyond merely acknowledging environmental considerations to state that climate change is already harming Wisconsin, and that the PSC is stepping forth to make--indeed, is leading the way in making--the changes in energy sourcing and use needed to reduce this harm.

The draft is written in a manner that implicitly supports the interests of private utilities, which prioritize the short-term interests of their investors. This implicit orientation is not appropriate for the Public Service Commission. It does not provide everyday citizens the choice and control over how they purchase and use electricity, which not only is more just but also can help reduce energy demand, and thus reduce CO2 emissions. We therefore ask you to revise your draft SEA to state that you will rapidly enact policies and technologies that provide citizens choice and control over how they purchase and use electricity.

The draft does not mention the many emerging ways in which neighboring states are reducing their dependency on fossil fuels, such as different rate design options, more sophisticated system planning, and alternative procurement mechanisms for cost-effectively meeting grid needs. The draft also does not mention regulatory developments, such as interconnection code updates, supply innovations such as community solar (pursued by neighboring states), parallel generation, or third-party ownership (except regarding EVs). The revised SEA should present a plan for rapidly implementing these proactive and promising regulatory changes. If the PSC embraces these energy resource transitions, Wisconsin will be able to join our neighboring states and many other places across the country and globe in leading the way to a low-carbon future.

In conclusion, we ask you to act to enable Wisconsin to not only catch up with other states, but also become the leader that we know Wisconsin can be.

Thank you for considering our comments and requests.