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March 31, 2022

Public Service Commission of Wisconsin
4822 Madison Yards Way
P.O. Box 7854
Madison, WI 53707-7854

RE: Midwest Energy Efficiency Alliance (MEEA) Response to Focus on Energy Quadrennial Planning Process IV - Phase I (Docket 5-FE-104)

Introduction

Thank you for the opportunity to submit comments in response to the fourth Quadrennial Planning Process for the Focus on Energy Program. The Midwest Energy Efficiency Alliance (MEEA) is a collaborative network, promoting energy efficiency to optimize energy generation, reduce consumption, create jobs and decrease carbon emissions in all Midwest communities. MEEA seeks an achievable pathway for all people and communities in the Midwest to receive the economic, environmental and societal benefits of energy efficiency and the larger clean energy economy.

At MEEA, we leverage our expertise to be the Midwest's leading resource for our members, allies, policymakers and the broader sector to promote energy efficiency as the essential pathway to achieve a clean, affordable, equitable and sustainable future. We see energy efficiency as the least cost foundation of the clean energy economy, creating immediate energy savings, providing career pathways, reducing emissions, improving new and existing buildings and boosting Midwest business and industries. MEEA develops connections and engagement opportunities for a diverse group of organizations to collaboratively create practical solutions. MEEA serves as a technical resource and promotes program and policy best practices and highlight emerging technologies, all to maximize energy savings, reduce costs, improve resiliency and lower energy burden. By lowering customer bills and increasing job opportunities in the clean energy workforce, energy efficiency is also a powerful tool for economic recovery in the current economic crisis.

With a knowledgeable and experienced staff capable of producing high-value content across a broad range of energy efficiency issues, MEEA takes pride in educating legislators and regulators throughout the region to recognize and implement cost-saving measures that are environmentally sound with a positive economic impact. As a nonpartisan nonprofit organization, we are recognized in the policymaking process and are frequently relied upon as an expert resource, weighing in on proposed policies, identifying opportunities for businesses and helping explain the benefits of embracing energy efficiency. MEEA's members headquartered or operating in Wisconsin include Alliant Energy, APTIM, Franklin Energy, Mid-West Energy Research Consortium, Slipstream, We Energies, Wisconsin Public Service, WPPI Energy, Xcel Energy and the Wisconsin Office of Energy Innovation, among others.

MEEA has been engaging with several of the PSC's dockets and state planning processes over the last two years. We participated in the Governor's Task Force on Climate Change by attending meetings of the Energy, Housing, Infrastructure & Transportation Subcommittee and submitting comments on draft recommendations. The organization also participated in the

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state's development of a clean energy plan, which is due to be released this month. MEEA commented in the Roadmap to Zero Carbon docket where we discussed several topics that have since been folded into this Quadrennial Plan process. Lastly, MEEA presented at the PSC workshop on performance-based regulation in January 2022. Because of this, MEEA feels equipped to respond to this phase of Quadrennial Planning, and we look forward to supporting and promoting efforts to enhance and expand energy efficiency in Wisconsin.

In summary, these comments support the Commission and Staff's efforts to consider how to modernize and expand the Focus on Energy program. MEEA understands that support of these efforts may in turn reduce program funding for existing Focus programs, which will result in difficult decisions for the Commission and Focus. With that in mind, MEEA supports the following alternatives presented by PSC Staff:

- Issue I: Either Alternative One or Alternative Two, along with Sub-Alternative A or Sub-Alternative B
- Issue II: Alternative One
- Issue III: Alternative One
- Issue IV: Alternative One
- Issue V: Sub-Alternative A, with components of Sub-Alternative B, Alternative One, Alternative Two, Alternative Three and Alternative Four

I. Aligning Focus on Energy Performance Goals and Program Offerings with Decarbonization Goals

This particular goal is a unique challenge for the Focus on Energy program. For many Midwestern states and utilities with decarbonization goals, increasing energy efficiency programming and ramping up decarbonization efforts are one in the same. Though not always its primary charge, the Focus on Energy program has achieved meaningful emissions reductions and the Commission has made policy decisions to account for these benefits, as noted by Staff. However, understanding how to align these goals and value these benefits are challenges that could be especially thorny in a statewide administrator model.

Staff does a commendable job of presenting Wisconsin's policies, the decisions on previous Quadrennial Plans and how different jurisdictions are adopting performance metrics to align with decarbonization goals. The Alternatives presented for aligning Quad IV with decarbonization goals show different levels of urgency in addressing the issues – and of these, only Alternatives One and Two really reach beyond the status quo and push the state toward greater decarbonization. Without the adoption of one of these two Alternatives, Focus runs the risk of losing its influence and relevancy. While other Midwestern states have taken substantial action to ramp up energy efficiency in conjunction with decarbonization efforts, Focus' portfolio has largely stayed the same, even cutting some energy saving programs (appliance recycling) due to budget constraints. Several of the state's utilities and municipalities are eager to push forward with innovative efforts to meaningfully decarbonize. Focus on Energy can and should be a partner to help them achieve their goals. Accordingly, MEEA supports adoption of one of these two positions. Alternatives Three and Four simply do not do enough to address the urgency of the situation. It is imperative that Focus expands and modernizes its strategies to adequately respond to the need for rapid decarbonization.

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Staff correctly notes that it often takes a multi-year consensus building effort to shift program frameworks and that the current Focus funding does not allow for substantial allocation toward research, planning and stakeholder engagement. While MEEA supports the goal of Alternative One, we understand if the Commission views that adopting Alternative One and making decisions to expand the role of Focus within Quad IV may be burdensome. It would likely be administratively challenging to conduct the necessary research and planning to immediately reorient the entire Focus program. Therefore, adopting Alternative Two along with either Sub-Alternative A or Sub-Alternative B could also be a sensible choice – spreading the research and collaborative efforts over multiple years rather than trying to accomplish those feats before or at the very beginning of Quad IV. Annual progress made by a Sub-Alternative A working group could be used to align the working plan for the next program year, making incremental steps and gaining experience that will translate to a fully expanded Focus role for Quad V. A Sub-Alternative A working group could use the framework established by the National Standard Practice Manual for Benefit-Cost Analysis of Distributed Energy Resources[1] (NSPM for DERs) to assess the state policy goals and the metrics that can be used to measure the progress toward those goals, and that work could be further used by the Commission and other state agencies for aligning both Focus and non-Focus energy resources toward a decarbonization goal.

MEEA commends the Commission and Staff for its willingness to adapt the Focus program to meet the urgency of the climate crisis. Ultimately, we feel that only Alternatives One and Two, in conjunction with a stakeholder group from Sub-Alternative A or a Commission investigation from Sub-Alternative B, are transformative enough for Focus to make meaningful progress in statewide decarbonization.

II. Electrification Programs and Offerings

PSC Staff take a nuanced view of electrification in this memo, one that MEEA shares. Over the last decade or so, many states, utilities and advocates have been planning for a decarbonized future. Electrification has recently emerged as a realistic avenue to contribute to decarbonization, and several states in MEEA's thirteen-state territory are preparing for electrification programs. Electrification can certainly reduce carbon emissions in certain deployments, but without careful planning electrification measures have the potential to exacerbate grid strain and increase energy burden.

Prior to 2021, no Midwestern states had regulation or legislation that encouraged fuel-switching, and Kansas and Minnesota had bans on fuel-switching in place.[2] Per a 2003 Minnesota Department of Commerce order, Minnesota utilities were not allowed to fuel-switch under the Conservation Improvement Program (CIP), which is the state's framework that guides utility energy efficiency programs.[3] In the remaining Midwestern states, some states have historically discouraged fuel-switching, especially in energy efficiency frameworks, as installing

[1] National Standard Practice Manual, https://www.nationalenergyscreeningproject.org/national-standard-practice-manual/
[2] ACEEE, State Policies and Rules to Enable Beneficial Electrification in Buildings through Fuel Switching, aceee.org/sites/default/files/pdfs/fuel_switch_revised_5-14-20.pdf
[3] Division of Energy Resources, CIP Policy Guidelines: Energy Savings from Delivered Fuels, mn.gov/commercestat/pdfs/conserve-prog-delivered-fuels.pdf

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electrification measures may result in a net increase of energy sales by a utility, which runs counter to the statutory charge of energy efficiency programs.

This began to change in 2021 with the passage of the Energy Conservation and Optimization (ECO) Act in Minnesota and the Clean and Equitable Jobs Act (CEJA) in Illinois. PSC Staff correctly point to these examples of how Midwestern states are considering electrification in an energy efficiency framework. Both pieces of legislation were developed in coordination with large stakeholder groups over several years.

CEJA is a massive, 900-page law that covers statewide decarbonization, health and safety issues, workforce development, environmental justice goals and more. The relatively narrow in scope ECO Act may serve as a more useful example for Wisconsin to consider. Minnesota has historically taken a similar approach to Wisconsin when it comes to regulating fuel-switching. As mentioned, the state banned utilities from fuel-switching under its energy efficiency framework. However, a 2012 Minnesota Department of Commerce order allowed one exception: utilities could offer energy-saving fuel switching measures to low-income customers using CIP-exempt fuels, like those who use delivered fuels or are members of small municipal gas utilities.[4] This is relatively similar to the Alternative One in this Staff memo to allow for electrification only in situations where the original fuel source is an unregulated fuel. This could be a useful precedent for Wisconsin regulators to study.

As demonstrated by PSC Staff, the ECO Act builds upon this 2012 framework by enabling fuel-switching more broadly, not just of CIP-exempt fuels. In order to qualify as an efficient fuel-switching improvement, the measure must:

- result in a net reduction in the amount of source energy consumed for a particular use, measured on a fuel-neutral basis;
- result in a net reduction of statewide greenhouse gas emissions over the lifetime of the improvement;
- be cost-effective, considering the costs and benefits from the perspective of the utility, participants, and society; and
- be installed and operated in a manner that improves the utility's system load factor.[5]

Additionally, to ensure that electrification is deployed in a measured way, the law caps spending on fuel-switching programs at .35% of the utility’s gross annual retail sales for investor-owned utilities and .55% for consumer-owned utilities.

The ECO Act is a result of compromise and was passed with bipartisan support. In part, legislators sought to enable fuel-switching because they viewed its prohibition as a barrier to the state’s emission reduction goals. But the ECO Act also emerged from the desire to give the states rural electric cooperatives and municipal utilities some regulatory flexibility to meet their required energy efficiency savings. Electric munis and coops must still reach 1.5% in annual energy savings, but now .55% can come from fuel-switching measures.

[4] Division of Energy Resources, CIP Policy Guidelines: Energy Savings from Delivered Fuels, https://mn.gov/commerce-stat/pdfs/conserve-prog-delivered-fuels.pdf
[5] Energy Conservation and Optimization Act, revisor.mn.gov/laws/2021/0/Session+Law/Chapter/29/

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The ECO Act demonstrates that electrification can be a tool for consumer-owned utilities. Additionally, the stakeholders who supported ECO included natural gas utilities. The final outcome was one that was largely palatable to the gas utilities as they, too, could benefit from electrification measures by claiming those energy savings.

This demonstrates that Alternative One is a valid option for Wisconsin. It is not an extreme measure; rather, it is in line with other states in the region. ECO and CEJA certainly go further in their allowances of electrification programs, but the regulatory framework Minnesota had in place prior to ECO is very similar to what Staff are proposing with Alternative One. Importantly, customers will only see the environmental and economic benefits of fuel-switching if the fuel-switching measures are paired with energy efficiency to ensure building envelope tightness. Without efficiency, it's certainly possible that electrification could lead to higher energy bills for customers. If done correctly, enabling fuel-switching from delivered fuels can reduce energy burden, improve indoor air quality and reduce emissions in Wisconsin communities. MEEA is confident that Wisconsin will take a measured approach, as PSC Staff seem aware of the potential challenges and negative consequences. With that, MEEA encourages the Commission to consider Alternative One.

III. Utility Voluntary Programs

Wisconsin historically was a regional leader in energy efficiency. However, as the Focus on Energy budget has stagnated over the years, Wisconsin has fallen behind several of its Midwestern peers in both program spending and achieved energy savings. In the last few years, Wisconsin has been passed by Missouri and Indiana, both of which do not require its utilities to do energy efficiency but rather have a regulatory framework that enables utilities to voluntarily run programming. While Focus on Energy and its program administrator Aptim have done excellent work in utilizing their funds to run cost-effective energy saving programs, the current restrictive budget means Wisconsin is missing out on available cost-effective energy savings, as noted by Staff. MEEA is encouraged that the state's utilities have collectively increased their budgets for voluntary programs from $3.5 million in 2018 to $5.4 million in 2022. However, this is only a fraction of the amount that could be spent to reach the additional savings. This Quad Plan provides Wisconsin an opportunity to see how the Commission could create a regulatory environment that fosters additional utility voluntary programming to complement the Focus on Energy Program.

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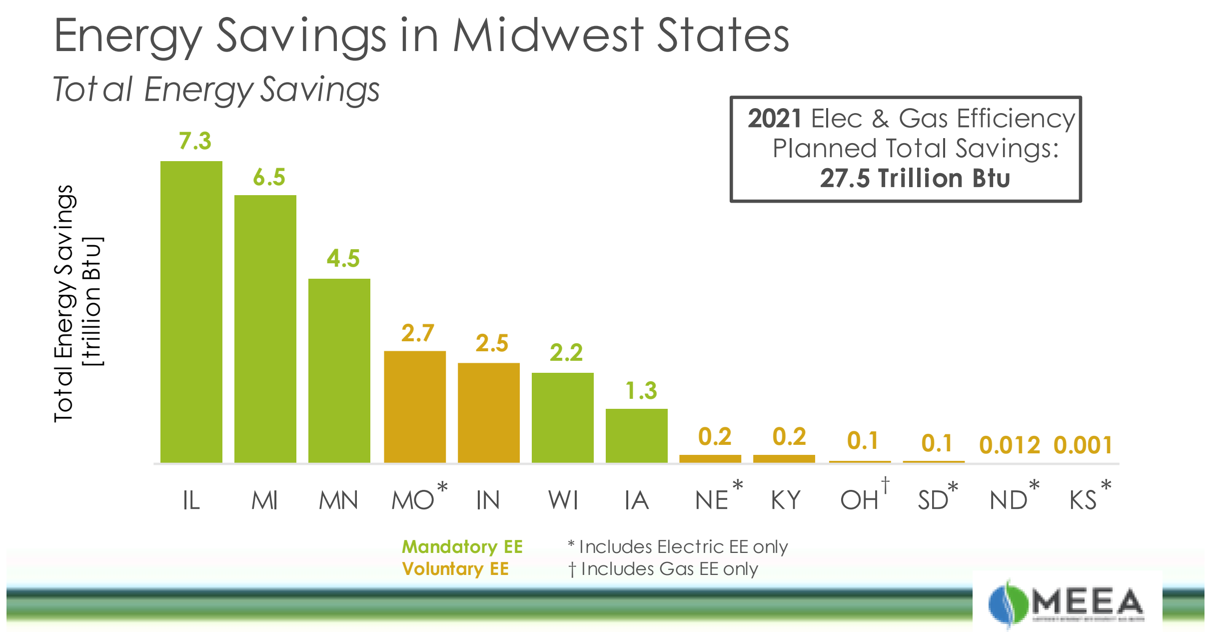

MEEA is agnostic to whether utility voluntary programs should focus exclusively on boosting existing Focus on Energy programs or be standalone programs that target low-to-moderate income Wisconsinites. Either way, MEEA acknowledges the challenges that utilities have faced in planning and implementing voluntary programs outside of the Focus structure, as PSC Staff point out. However, it should be noted that utilities in several other Midwestern states have been able to overcome these barriers to reach deeper levels of energy savings than Wisconsin. The hurdles that are cited in this memo can be overcome.

One way to increase voluntary programs is through utility incentives, which are mentioned by Staff. MEEA has commented in previous PSC dockets on this issue, and we presented at the January 2022 performance-based regulation workshop. We agree with other stakeholders that incentives could encourage utilities to reach significant levels of energy savings and Wisconsin could tailor the incentive structure to encourage desired outcomes.

And secondly, Wisconsin could create a statewide utility collaborative where utilities, PSC Staff, advocates and customers could come together to discuss and overcome barriers to voluntary program design and implementation, which is discussed at length in this memo by Staff. Several Midwestern states have these collaboratives: Illinois with its Stakeholder Advisory Group (SAG), Michigan with its Energy Waste Reduction (EWR) Collaborative and Missouri with its Missouri Energy Efficiency Advisory Collaborative. These states have set up their collaboratives differently, with Illinois' SAG originating in statute and Michigan's EWR Collaborative set up by the state's PSC where participants join on a voluntary basis.

These collaboratives have fostered collaboration, contributed to innovative program design, helped identify barriers in program delivery and served as a network for utilities to interact with their customers and advocates. Collaboratives have also reduced administrative burden, as these networks help hash out program decisions that may have arisen in the docketed cases. These spaces have helped to increase energy savings but have also helped ensure those

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energy savings are experienced equitably amongst customer classes, even those sectors that have historically been more challenging to access. Michigan, for example, has its EWR Collaborative but also a Low-Income EWR Collaborative that focuses on the unique challenges of administering and marketing energy efficiency programs to the low-income sector.

It could be argued that Wisconsin has historically not needed a collaborative, as the state is the only in the Midwest with a statewide program administrator. However, if the Commission would like to see increased utility voluntary programming, MEEA does recommend exploring a formal collaborative structure.

MEEA sees the value in this framework and agrees that Alternative One could foster collaboration between utilities and Focus on Energy. We would recommend that the Commission take Alternative One but use this framework as a steppingstone to ensure regular, open and collaborative meetings are held. Hosting quarterly meetings for the steering committee is a useful first step, but MEEA would recommend that this framework be expanded to ensure that all stakeholders have a chance to participate, not just the steering committee, and that the collaborative (or workgroups of the collaborative) meet more frequently than quarterly at least in the beginning of the process of setting up additional voluntary programs. MEEA believes that other stakeholders in the energy efficiency industry, like energy efficiency implementers, utility customers, community-based organizations and advocacy organizations, could both benefit from and provide a benefit to the steering committee of this framework. For example, the PSC workshop on performance-based regulation was a successful meeting where several stakeholders were able to share their perspectives. Regulators and utilities benefitted from this open and collaborative conversation, and additional development of performance-based regulation would benefit from being discussed in a similar format.

MEEA is encouraged by Alternative One but asks that the Commission consider this framework be as open and expansive as possible. Based on our participation in other statewide collaboratives in the region, MEEA is confident that a robust collaborative structure could provide solutions to help increase voluntary utility programs.

IV. Collaboration Between Focus and Utility Demand Response Programs

Each Midwestern state has a slightly different definition of energy efficiency. Wisconsin has not been alone in its exclusion of load management in its consideration of energy efficiency programs. As Staff point out, it is understandable that the statewide administrator model may not be the most well-suited to conduct load management operations. That being said, several Midwestern states do include demand response and load management programs within their energy efficiency frameworks. MEEA supports efforts to increase collaboration between utilities and Focus on Energy in order to expand and improve demand response programming.

As the region's leading advocate for energy efficiency and its environmental and economic benefits, MEEA supports any Commission efforts to ramp up demand response and load management programs. We have discussed the benefits of energy efficiency and demand response in several previous commenting opportunities, but we will emphasize here that any additional efforts to save energy by the states' utilities will save customers money, reduce unnecessary utility infrastructure build out, benefit the grid by reducing peak load and decrease harmful emissions. These benefits remain regardless if the energy savings measure is behind the meter or not. Increasing demand response programs through collaboration will have benefits for

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Wisconsin's utilities and their customers. As Wisconsin customers slowly begin to electrify their homes and vehicles, demand response will become even more critical to counteract the increasing electric load.

As noted by Staff, demand response programming can present challenges like lack of customer knowledge or technical issues upon program deployment. Much like our comments on Issue III, MEEA believes that increased collaboration amongst utilities, PSC Staff and advocates is useful to overcoming barriers and increasing program quality. MEEA agrees with the Staff recommendation that a future collaborative structure could include demand response. Increasing collaboration to conserve resources and overcome technical barriers in implementation of demand response programming is a low-risk option for the Commission, as Focus on Energy is already perfectly suited to help improve program marketing, increase customer education and reduce waste. MEEA recommends Alternative One.

V. Affordability- Low-Income and Income-Qualified Programs and Offerings

Increasing low-income energy efficiency programming a critical step to improve energy affordability and reduce energy burden. While emergency bill assistance can help families keep their lights on, this kind of aid is a temporary solution that does not get at the root of the issue. Energy efficiency measures can permanently and meaningfully reduce a customer's energy costs. These financial benefits are even more apparent when a structure receives whole-building retrofits as opposed to smaller measures like kits with lightbulbs and door stripping.

As discussed in Issue III, Wisconsin has fallen behind its Midwestern peers on program spending and energy savings. This remains true in the low-income sector. In Michigan, DTE and Consumers both recently reached settlements with intervenors on their energy waste reduction portfolios. Consumers will spend nearly $200 million ($85 million for electric, $113 million for gas) on low-income efficiency programs from 2022-2025.[6] DTE is set to spend $99 million on low-income efficiency for 2022-23, about $38 million more than the company spent in 2020-21.[7]

These filings also contain innovative ideas for new programs to help low-income communities save more energy, like exploring an on-bill financing mechanism, conducting geographic targeting and funding a health and safety pilot to help households that are turned away for weatherization services.

Minnesota's ECO Act increased the amount the state's investor-owned utilities (IOUs) must spend on low-income energy efficiency.[8] Electric IOUs saw their requirement increase from .2% residential gross operating revenues (GOR) to .4%. That requirement will go up to .6% in 2024 when the utilities file their next efficiency plans. Gas IOUs will now need to spend 1.0% GOR, up from .4%. This means that Xcel will need to increase their annual minimum spending on low-

[6] MPSC Order Approving Settlement Agreement for Consumers Energy Company's Proposed Energy Waste Reduction Plan for 2022 through 2025, https://mi-psc.force.com/sfc/servlet.shepherd/version/download/0688y000002M86GAAS
[7] MPSC Order Approving Settlement Agreement for DTE Electric Company's Proposed Energy Waste Reduction Plan for 2022-23, https://mi-psc.force.com/sfc/servlet.shepherd/version/download/0688y000001noqBAAQ
[8] Minnesota Passes the ECO Act, a Modern and Expansive Update to its EE Framework, https://www.mwalliance.org/blog/minnesota-passes-eco-act-modern-and-expansive-update-its-ee-framework

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income electric efficiency programs from approximately $2.4 million to $7.2 million in 2024. CenterPoint, a gas utility, will need to increase their low-income program spending from $2.4 million to $6 million annually. Minnesota utilities often spent over their minimum requirements, but these increased requirements prove the legislature's commitment to improving access to efficiency programs for low-income customers.

Lastly, Illinois' CEJA dramatically increased low-income spending requirements for electric efficiency programs. Ameren's required spending was increased from $8.35 million to $13 million, and ComEd's required spending was increased from $25 million to $40 million.[9] The law also requires that 80% of the electric utilities' low-income spending be dedicated to whole-building weatherization programs as opposed to piecemeal measures. Additionally, the electric IOUs must have a designated health and safety fund to address walkaway issues for the state's weatherization program.

These examples show that several of Wisconsin's neighbors are serious about improving low-income energy efficiency. While Minnesota and Illinois passed laws to do so, Michigan did not. As mentioned in our previous comments on performance-based regulation, Michigan has a robust incentive structure that has encouraged the state's utilities to increase their energy efficiency budgets. Wisconsin could utilize an incentive mechanism to encourage additional low-income program spending without passing sweeping legislation like Minnesota and Illinois did.

The summary of Commission initiatives on affordability demonstrate that the Commission is committed to exploring ways to increase low-income programming in Wisconsin. Sub-Alternative A would be a great way to continue the work of the Commission on affordability issues. Much like our support of a collaborative in Issue III and Issue IV, an open collaborative with community-based organizations and marginalized communities can help utilities and Focus overcome barriers to serving low-income communities. Illinois' Income Qualified Energy Efficiency Advisory Committee, Michigan's Low Income Energy Waste Reduction Collaborative and Missouri's Low-Income Working Group of the Missouri Energy Efficiency Advisory Collaborative are three examples of low-income collaboratives in the region. These collaboratives have helped increase trust and understanding between utilities and customers while improving the quality and access of low-income efficiency programs. This future collaborative in Wisconsin could also help the Commission establish Key Performance Indicators (KPIs). MEEA supports the outcome of Sub-Alternative B, as KPIs can help the Focus program understand its targets and focus its scope of work in this sector. However, the formation of these KPIs would likely benefit from the perspective of community-based organizations and low-income advocates. MEEA supports the creation of KPIs in Sub-Alternative B but asks the Commission to consider an inclusive process for this work.

MEEA is hesitant to be too prescriptive on which alternatives the Commission should take in this Issue. Additional resources are needed to increase the quantity and scope of the state's current low-income efficiency programs. Ultimately, it is challenging to choose whether these resources are primarily allocated at 60% of SMI (Alternative One) or at 60-80% of SMI (Alternative Four). Additionally, MEEA supports the idea of community-based pilots in Alternative Three, as many successful low-income programs started as community-based pilots in several Midwestern states.

[9] Illinois Climate and Equitable Jobs Act, https://ilga.gov/legislation/102/SB/PDF/10200SB2408enr.pdf

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MEEA sees the value in increased collaboration with the state's existing weatherization program and filling program gaps, as suggested in Alternative Two. MEEA takes an all-of-the-above approach on this Issue. Ultimately, reducing energy burden of the state's most vulnerable communities will require additional energy efficiency programs at various income levels, coupled with coordination with the state's weatherization program and the deployment of community-based pilots. MEEA would recommend that the Commission start with a low-income collaborative as described in Sub-Alternative A. Hearing directly from impacted communities may help the Commission and Focus decide where is best to allocate its finite number of resources.

It is important to note that Focus does not have to be alone in offering low-income programming. While in an ideal world Focus would not have to choose whether to fund households at 60% of SMI or increase braided funding in the weatherization program, it may ultimately have to decide. In addition to a low-income collaborative, the Commission should continue to study how performance-based regulation could be used in the low-income space. It's possible that Focus, as a statewide administrator, would be best served to coordinate its low-income programming with the state's weatherization programs. Incentives could be structured to encourage voluntary utility programs to fill the gaps. Regardless of which alternative the Commission picks in this Issue, it will be imperative for the Commission to find ways to ramp up voluntary utility programming in the low-income sector in order to meaningfully uplift the state's most vulnerable communities.

Conclusion

MEEA thanks the Commission for the opportunity to comment on this important matter. Wisconsin's arrangement of a statewide administrator is unique and has long been successful in reaching energy savings throughout the state. However, due to restrictive budgets, Wisconsin has fallen behind its Midwestern peers in program spending and energy savings. MEEA appreciates that the Commission and Staff are using the Quadrennial Plan process to explore how Focus on Energy can reach deeper energy savings and expand what energy efficiency looks like in Wisconsin.

Ultimately, the decisions the Commission must make are challenging, especially given the finite budget of the Focus on Energy program. Including and/or ramping up fuel-switching, demand response and low-income programming may require the Commission to take funds away from other successful Focus programs.

MEEA supports expanding the charge of Focus on Energy. Carbon reduction, electrification, utility collaboration, demand response and low-income programming are ways to reach more savings that can have meaningful environmental and economic impacts throughout the state. Wisconsin is not alone in considering how these programs could reduce energy burden, increase utility system reliability, reduce carbon emissions and more. Many other Midwestern states are including these kinds of programs within their energy efficiency frameworks.

MEEA is appreciative of the opportunity to weigh in on this Quadrennial Plan process. We are confident that the Commission and Staff will make these structural changes in a thoughtful and measured way. MEEA looks forward to aiding Staff and the Commission in its efforts to expand and modernize the Focus on Energy program to reach more energy savings. If you have specific questions on these comments or want additional information, please contact Maddie

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Wazowicz, MEEA Policy Manager at mwazowicz@mwalliance.org. Thank you for your consideration.

Sincerely,

Stacey Paradis

Stacey Paradis
Executive Director, MEEA

These comments reflect the views of the Midwest Energy Efficiency Alliance – a Regional Energy Efficiency Organization as designated by the U.S. Department of Energy – and not the organization's members or individual entities represented on our board of directors.