



September 28, 2022

Board of Directors, Customers First! Coalition  
c/o Kristin Gilkes, Executive Director  
10 E. Doty St.  
Madison, WI 53703

Customers First! Board of Directors:

After much internal deliberation, we at RENEW Wisconsin believe that the time has come to end our long association with Customers First! Coalition (CFC). In accordance with our decision to withdraw from this coalition, we ask that you remove all references to RENEW Wisconsin as a coalition participant from your printed and online materials as soon as practicable.

Our decision to withdraw from CFC was not undertaken lightly. RENEW had been a founding member of CFC since it was formed in 1994, and actively took part in coalition efforts to defeat proposals for deregulating the state's electric power sector and dismantling the regulatory model that had served Wisconsin well for so many years. Our position on that core principle has not shifted over the intervening 28 years.

For many of those years, RENEW's membership in CFC was helpful to our overall mission of expanding the production and use of renewable energy in our state. Participation in CFC provided us with a platform for amplifying our voice on a number of policy initiatives to advance renewable energy, most notably Wisconsin's Energy Efficiency and Renewables Law (2005 Act 141). That very balanced law embodied many of the values that CFC holds dear.

And it's fair to say that RENEW's active participation in CFC provided credibility to the coalition, enabling it to broker wide-ranging policy initiatives that were supported by environmental and clean energy constituencies. From our vantage point, RENEW's involvement in CFC clearly advanced the public interest in renewable energy development, yielding benefits to our members as well as to our coalition partners.

Regrettably, that is no longer the case. We now find ourselves on the opposite side from CFC over three policy matters before the Public Service Commission of Wisconsin and/or the state legislature. These are:

- Third party financing of behind-the-meter renewable generation and storage systems;
- Expansion of community solar options for all Wisconsin customers; and
- Allowing the use of solar power at commercial electric vehicle charging stations.

While RENEW acknowledges the many benefits that Wisconsin energy consumers derive from effective utility regulation, it is crucial that our regulatory framework remain responsive to the

ongoing evolution in renewable energy technology and economics. Distributed energy resources today can deliver a level of savings and operational flexibility to customers that were considered unthinkable 15 years ago. If Wisconsin is serious about clearing pathways for such beneficial electrification technologies as solar and storage, electric vehicle charging, heat pumps and community solar, it must update and clarify the utility regulations that presently hinder customers from pursuing those options.

To put it in simple terms, we disagree with CFC over the boundaries of utility regulation. RENEW believes that the utility meter defines the boundary separating the regulated sphere from the customer's private space. On the other hand, CFC's view of regulated space is far more expansive and extends well into the customer's sphere. On this and other fundamental matters involving distributed energy resources, the positions taken by CFC are identical to those of Wisconsin Utilities Association and other electric provider associations. For that reason, we have concluded that our differences are irreconcilable, and our membership in CFC is no longer tenable.

Even the bylaws that were created when CFC was formed recognized that members who publicly oppose the official position of the CFC Board should withdraw from the organization:

*SECTION 10.3. Treatment of Founding Members. All Founding Members shall be treated as equals by the Officers and Executive Director in the formation of the policies and positions of the Corporation and in its activities. The Corporation shall only take public positions that have been approved by the Board of Directors. **A Founding Member shall not act to undermine policies and positions approved by the Board, unless the Founding Member withdraws from the Corporation.***

RENEW Wisconsin and our members look forward to continuing our conversations with the CFC Board and your individual member companies and organizations on the many renewable energy policy issues that are so important to Wisconsin's citizens.

Respectfully yours,

Jessica Niekrasz, Interim Executive Director  
RENEW Wisconsin