

# Third-Party Solar Health Toolkit

*A guide for making your health voice heard for clean energy*



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# Background

## THIRD-PARTY SOLAR FINANCING

A decision that would brighten Wisconsin's future

### WHAT IS THIRD-PARTY SOLAR FINANCING?

Instead of an individual paying the upfront costs of a solar array on their property, a third-party can finance the costs through leases or power purchase agreements. Similar to leasing a car or other purchase, third-party solar financing makes solar energy more accessible for low to middle-income households, businesses, and nonprofits.

### WHAT ARE THE BENEFITS?



**Lower Costs & Less Stress:** Financing options provided by Third-Party agreements would allow clinics and hospitals the flexibility to build projects before they have all the capital funds needed. With Third-Party, a clinic can also have another entity install and manage the solar panels on their property while simultaneously saving money on their energy bills.



**Better Health:** Less fossil fuel combustion improves air and water quality immediately. If Wisconsin transitions to 100% clean energy, it will save 1,900 lives and \$21 billion EVERY YEAR in avoided health damages. The renewable energy transition is also a critical step for combatting the climate crisis, which has been declared a health emergency by hundreds of medical and public health organizations.



**Resiliency:** Rooftop solar and local solar arrays make power systems more resilient during extreme weather. Local energy creation, on clinics and hospitals, requires less large transmission lines that can be damaged. These arrays can help meet energy needs even when centralized systems experience a disruption.



**Increases Equity:** Third-party solar reduces financial barriers to low-income and BIPOC communities that bear the disproportionate health harms of air pollution and climate change. All households should have access to clean technology that can reduce their energy prices and improve well-being. Building these arrays can also invigorate local economies by bringing good, high-paying jobs to new areas.

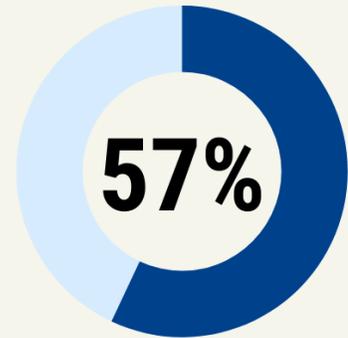
### TAKE ACTION

We need you to submit a comment to the Public Service Commission (PSC) of Wisconsin or sign on to our comment by **November 8**, urging them to enact Third-Party Solar in Wisconsin.

# WISCONSIN IS BEHIND

## DID YOU KNOW?

57% of non-residential solar capacity installed across the U.S. in 2017 was owned by a third-party. Over the last four years, **83% of solar installations in New Jersey were third-party financed.**



TOP

10

SOLAR LEADERS

All of the top 10 solar per capita states in the U.S. allow for Third-Party Financing.



**In Minnesota, third-party projects are saving people 15 to 30 percent on their electricity bills.** In cases where building owners do not want to deal with the headaches of an installation, third-party solar can take that away.



**28 states + D.C.**

Explicitly allow third-party financing

**"For us it was a win-win situation; we're not out anything,"** said Dan Miller, Director of Operations for Farmington Area Schools. Their installation which mixes rooftop with ground-mounted solar is expected to **save the district \$2.7 million over 25 years.**

**OVER 70% OF WISCONSINITES WANT CLEAN ENERGY. WE CAN START BY ASKING THE PUBLIC SERVICE COMMISSION TO LEGALIZE THIRD-PARTY FINANCING**

[Click here for references and more resources](#)

# Why Does Third-Party Solar Matter for Health & Health Systems?

Key decision-making bodies and organizations have signaled their interest in decarbonizing healthcare, including the [U.S. Health and Human Services](#), the [National Academy of Medicine](#), and the [American Medical Association](#). Unfortunately, in an energy system reliant on fossil fuels, we harm our patients by producing pollution while trying to care for them. In 2018, [U.S. healthcare emissions resulted in a loss of 388,000 disability-adjusted life-years](#). The health sector is responsible for [~8.5 percent of U.S. carbon emissions](#), which directly accelerate the climate crisis and have profound implications for public health. For this reason, [editors of over 230 medical journals](#), such as the *Lancet*, the *New England Journal of Medicine*, and *BMJ*, have called on health professionals and health systems to take immediate action.

With affordable, clean energy becoming the norm, we in healthcare can fulfill our oath of doing no harm while saving money. Health systems are recognizing the broad benefits of energy initiatives for their bottom line and health justice within their communities (read some [success stories](#)).

Financing options provided by Third-Party agreements would allow clinics and hospitals the flexibility to build projects before they have all the capital funds needed. With Third-Party, a clinic can also have another entity install and manage the solar panels on their property while simultaneously saving money on their energy bills (read [Sutter Amador Hospital's story](#)). Budgets are tight, so this change is critical.

It's also essential for promoting equity, inclusion, good-paying jobs, and better health in our communities. Low-income families, small businesses, and schools often can't afford the upfront costs to install solar on their property, but they have the most to gain in financial and wellness benefits. Third-party is an essential step towards justice in the renewable energy transition. [A recent study](#) found that Wisconsin rooftops could meet two-thirds of the state's electricity needs, but 98% of those panels won't be installed under current market conditions. Now we have an opportunity to change that.

## Now Is The Time

The lack of legal clarity on this issue is an unjustifiable restriction. [Over half of U.S. states have specifically designated third-party financing as legal](#). This decision on legality is crucial to attracting investments and long-term planning that increases solar capacity.

Third-party solar has bipartisan and broad support in Wisconsin's business and health community. The Public Service Commission has the chance to get this done, and we need your help to make sure they do it.

# A Brief Guide to the Wisconsin Public Service Commission

## What Does the Public Service Commission do?

Since essential utilities such as electricity, gas, water, and telecommunications, are given monopoly status within their geographic service region in Wisconsin, the [Public Service Commission's](#) (PSC) job is to regulate these services. This regulatory agency consists of three full-time commissioners appointed by the governor in staggered six-year terms and confirmed by the state senate. The PSC is responsible for many critical decisions that relate to health, such as where fossil fuel plants will be constructed, and they require public input to support their decision-making. They make decisions through the “dockets” they decide to consider.

## Why Are We Talking About Third-Party Now?

There are currently two dockets open simultaneously that address the legality of third party solar, one submitted by Vote Solar (9300-DR-106) and one submitted by Midwest Renewable Energy Advocates (9300-DR-105). Although the two petitions take different approaches to the legal question at issue, a positive ruling from the PSC on either or both of these filings would achieve the desired result: the ability of individual customers to access electricity generated on their premises from installations owned by third parties. **We need you to submit a comment to the PSC or sign on to our comment by November 8, urging the PSC to enact Third-Party Solar in Wisconsin.** The most effective thing to do is to write a single comment addressing both dockets (see example comment below) and upload it to the submission portals for both dockets.

## Commenting To the PSC Is Not Considered Lobbying in Wisconsin

Worried about lobbying as a 501(c)(3)? Worry no further because PSC dockets are not subject to lobbying percentages. Efforts to make an administrative agency of the government (including the PSC) change its policies or regulations are [not considered lobbying](#). For more information, we recommend [watching this video](#) from Scholz Nonprofit Law based in Madison. Minutes 11:40 through 14:50 review definitions of lobbying federally and in Wisconsin.

## 501(H): DEFINITION OF DIRECT LOBBYING

### Member of legislative body:

- includes members of Congress, state legislators, county commissioners, city council and international bodies that have legislative power **and**
- any actions by the general public in a referendum question, initiative petition, or proposed constitutional amendment.

### Legislator **usually\*** does **not** include officials in judicial, executive and administrative bodies:

- E.g. President Biden, Governors, Executive Agencies
- Members of local "special purpose bodies" (e.g., zoning board)

### **\*BUT** executive officials can be legislators if participate in formulation of legislation

- Signing bills into law or vetoing
- Influencing budget passed by legislature
- Senate confirmation of executive and judicial branch nominees and proposed treaties requiring Senate approval

*Image courtesy of Scholz Nonprofit Law*

# Example: Advocate Aurora



Advocate Aurora Health  
750 W. Virginia Street  
Milwaukee, WI 53204  
T (414) 299-1600  
F (414) 649-7982  
advocateaurorahealth.org

PSC REF#: 440148

Public Service Commission of Wisconsin  
RECEIVED: 06/13/2022 1:03:46 PM

To: Dockets 9300-DR-105 and 9300-DR-106 – Petition Support  
Public Service Commission of Wisconsin  
P.O. Box 7854  
Madison, WI 53707-7854

From: Advocate Aurora Health  
Katie Wickman  
Sustainability Manager  
katie.wickman@aah.org  
Andrew Hanus  
State Government Relations Director  
andrew.hanus@aah.org

**Re: Docket 9300-DR-105 & 9300-DR-106**

Advocate Aurora Health is writing to support the petitions filed by Midwest Renewable Energy Association and Vote Solar to affirm customer access to third party owned generation located on their premises (Dockets 9300-DR-105 and 9300-DR-106). We ask the Commission to accept these petitions and issue a Declaratory Ruling as requested by petitioners.

Advocate Aurora Health is the 9<sup>th</sup> largest not-for-profit, integrated health system in the United States and a leading employer in Illinois and Wisconsin with 75,000 employees, including 10,000 physicians and 22,000 nurses. We serve nearly 3 million patients annually across more than 500 sites of care and are champions of value-based care and population health.

We are keenly aware of the various environmental impacts that affect our patients' health. As an organization dedicated to helping people live well, we work to reduce our environmental impacts and advocate for a safe, healthy environment for our patients and neighbors, now and for generations to come.

In addition to aggressive energy efficiency efforts, we are committed to powering our health care operations with 100% renewable electricity by 2030. We expect that this transition will occur through various means, including on-site and off-site renewables, as well as through offsets when needed. In addition to providing cleaner air, we also expect that our renewable electricity projects will help build our resilience to extreme weather events or periods of peak demand.

The lack of clarity on third-party financing limits our options for on-site renewables for our Wisconsin facilities, hampering innovative, resilient projects that would help us reach our renewable electricity goal. Clarity and affirmation of third-party financing for on-site renewable projects in Wisconsin would benefit our organization in two ways:

- 1) **It would provide flexible financing options for solar projects.** As a non-profit organization, we are always balancing priorities when evaluating our limited capital funds. Without the flexibility of third-party ownership of solar projects, we will be forced to use capital for all new solar projects, limiting our options and potentially delaying projects until capital is available. Allowing for third-party ownership would expand the options available to us to meet our goal.

- 2) **It would level the playing field for non-profit organizations that are otherwise unable to access tax credits for solar installations.** Schools, local governments, non-profits, and houses of worship are often key players in the transition to clean energy but are unable to directly use federal tax credits that often make solar projects affordable. Third-party ownership can help these organizations, including Advocate Aurora Health, take full advantage of the credits available to help realize their renewable energy goals.

Additionally, as an organization dedicated to equity and inclusion, we understand third-party financing as an opportunity to promote equity in renewable energy. Third party ownership enables low-income families, who otherwise could not afford the large upfront costs to install solar on their property, to access solar with little to no upfront costs, reduce their energy burden, and protect their environment.

Thank you for the opportunity to provide support the Midwest Renewable Energy Association and Vote Solar to affirm customer access to third party owned generation located on their premises (Dockets 9300-DR-105 and 9300-DR-106). We ask the Public Service Commission of Wisconsin to accept the petitions and provide legal affirmation for third-partying financing of solar projects, which would provide our organization greater access and flexibility to renewable energy, financial savings, environmental benefits, all while supporting equity in our communities.

[Advocate Aurora Health letter of support](#)

# Making Your Voice Heard

While the strongest comments are generally those that speak to your story or mission, some statements could bolster the legal arguments being made in this case, such as:

- Health systems have pressing and clearcut reasons for greatly expanding their use of onsite solar power. These include: improving the health of their patient base and the communities they serve, minimizing harmful greenhouse gas emissions, taking responsibility for their environmental impact, reducing their energy overhead, and controlling the cost of medical services, et cetera.
- Healthcare networks and systems would like to avail themselves of the reasonable financing option articulated in this proceeding to incorporate more solar power in our operations.
- No current law or policy entitles Wisconsin utility companies to deliver every unit of power that a family, clinic, business, or hospital uses.
- Wisconsin needs the Commission to side with families, small businesses, and health systems, not powerful utility companies.

- Experiences from other states show that third-party ownership doesn't cause deregulation, reliability, or consumer protection concerns. Instead, it levels the playing field for customers like those filing this petition.

## Submitting your comment

We recommend utilizing the following base template to create your statement. Remember, your comment doesn't have to be long for you to impact the decision outcome.

1. **Introduce your expertise.** Your expertise does not mean you have to be a utility/electric grid policy expert. Being a health professional, a mother, or an administrator at a health system is a unique perspective. For example, use a statement like, "I am a doctor in Green Bay, and this decision will impact the families I care for."
2. **Explain why you care.** This can be your own story, reason, or information from the bullet points above.
3. **Express gratitude** for the opportunity to provide a comment.
4. **Submit your comment** to the following Public Service Commission Portals:  
[Submission Portal >>>](#) for Vote Solar docket  
[Submission Portal >>>](#) for Midwest Renewable Energy Advocates

**Need help or are short on time?** Simply email [wisconsinhpca@gmail.com](mailto:wisconsinhpca@gmail.com) for guidance, or [sign onto our letter here >>>](#)

## NGO Organizations & Health Systems

Comments from organizations are most impactful when they are submitted on official letterhead. In order to submit a PDF or Doc with your statement, you will need to get a PSC Electronic Filing Records account and file the document, here are the steps for doing that:

1. Go to this website:  
<https://apps.psc.wi.gov/ERF/ERFupload/content/UserProfileNew.aspx>
2. Create a logon ID, password, and confirm your email. Then press 'submit'.
3. Go back to the [Logon page](#) and log in to your account
4. Once in, navigate to the left side and click on 'Public' under the 'Upload Documents' section box will appear, enter: 9300 - DR - 106
5. Click 'Check Docket'
6. Red text will appear saying "Verified Petition of Vote Solar of Distributed Energy Resource Systems in Wisconsin." \*\*\*It's ok to upload documents to this docket\*\*\*
7. Choose your file to upload. Click 'Upload' to finish your submission

The screenshot shows a web interface for checking a docket. On the left, there is a 'Choose an Option' section with three radio buttons: 'Existing Docket' (which is selected), 'Existing Service Provider/ New Docket Application', and 'New Service Provider'. To the right is a 'Docket' box containing three input fields: '9300', 'DR', and '106'. Below these fields are two buttons: 'Check Docket' and 'Clear Docket'.

- 8. Do the same process to upload to 9300 - DR - 105

Need help or are short on time? Simply email [wisconsinhpc@gmail.com](mailto:wisconsinhpc@gmail.com) for guidance, or [sign onto our organizational letter here >>>](#)

# Deadlines & Timeline

- Public hearings | Zoom | November 2, 2022 at 2 PM and 6 PM  
For Audiovisual Connection: <https://us02web.zoom.us/my/pshearings>,  
For Telephone Connection: Dial +1 312 -626 -6799, and enter 809 513 2930# (Meeting ID)
- Comment period Closes | November 9, submit your comment by 6 PM  
[Submission Portal >>>](#) for Vote Solar docket  
[Submission Portal >>>](#) for Midwest Renewable Energy Advocates
- Decision expected before January 1, 2023

# Sharing with Others

## Social Media Toolkit

**Make a post on your account and ask other health professional organizations, societies, or nonprofits to share this with their groups.**

Here are example social posts:

- Calling health professionals in Wisconsin 📣! Your voice is needed to help bring more solar to our state. Our patients deserve less air pollution and a liveable climate. Sign onto our letter now: <https://www.wiclimatehealth.org/third-party> #MedTwitter
- Hospital systems, clinics, and families in Wisconsin should be free to finance and install solar on their own property. We need your help to make this a reality. Join our letter today: <https://www.wiclimatehealth.org/third-party>
- 100% renewable energy in the Badger state could save 1,910 premature deaths, 34,000 #asthma exacerbations, 49,400 respiratory system cases, and 650 heart attacks every year. We need third-party solar to help us get there, sign our letter: <https://www.wiclimatehealth.org/third-party>

[Click here to download social media graphics >>>](#)



# Email Template

## Add Something Personal

We invite you to use and edit the template below. Add something personal, by telling them why this matters to you. Why are you advocating for change? What inspires you? Why should your workplace care?

## Template for Sharing This with an Organization, members of a group, or a friend

Hi <Insert name>,

I hope you are doing well! As a <Insert your health profession>, I am concerned about the impacts of the climate crisis on my patients and community. Over 150 health organizations across the U.S. and over 230 medical journals have already declared climate change a public health emergency.

The good news is, transforming our energy systems will also bring better health to many Wisconsin families. A UW-Madison study found that 100% renewable energy in the Badger state could save 1,910 premature deaths, 34,000 asthma exacerbations, 49,4000 respiratory system cases, and 650 heart attacks every year.

Right now, we have an opportunity to bring Wisconsin one step further toward health, by giving businesses, schools, nonprofits, and families the freedom to finance solar projects.

The Public Service Commission (PSC) in Wisconsin will only be accepting public comment on this issue until November 9, so please join me in taking action today:

- [Use this toolkit to make your voice heard >>>](#). Filing an individual or organization-specific comment is the best way to show the PSC that a lot of Wisconsinites care about this issue.
- Short for time? You can sign onto our letter in under 3 minutes! Click to [sign on as an individual >>>](#) Or [join us as an organization >>>](#)

Let me know if you took action or if you have any questions. Thanks for taking the time to make Wisconsin's future brighter!

<Insert your name and credentials >

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# Have Questions or Would You Like 1-on-1 Help?

We are here to help. Email [wisconsinhpca@gmail.com](mailto:wisconsinhpca@gmail.com) with any questions or for assistance.

Thank you for taking action to promote better health!