



**Madison Gas and Electric Company**  
P.O. Box 1231  
Madison, WI 53701-1231  
608-252-7000

*your community energy company*

October 21, 2009

Mr. Rick Roll  
Senior Planner  
Department of Planning and Economic  
and Community Development  
City of Madison  
215 Martin Luther King, Jr. Boulevard  
Post Office Box 2984  
Madison, Wisconsin 53701

Subject: City of Madison Zoning Rewrite

Dear Rick:

As you know, Madison Gas and Electric Company (MGE) is interested in the zoning rewrite process the City is currently undertaking. We appreciate the time you and others at the City have spent keeping us informed on the progress of this matter.

It is our understanding the proposed zoning ordinance was introduced to the Common Council in September with the hope the Common Council will act on the proposed zoning ordinance by the end of 2009. It is also our understanding the zoning map will be completed once the Common Council has adopted the zoning ordinance. While this two-step process may offer some benefit to the City, it makes it nearly impossible for MGE to perform a meaningful review of the proposed zoning ordinance and its effect on MGE property. I make this point now so the City understands the few comments we provide in this letter do not mean MGE accepts the proposed zoning code as written. Once the zoning map is complete, MGE may have additional issues with the proposed zoning code and zoning map that will need to be addressed by the City.

At this time, MGE has two issues it would like to raise with the City.

1. **Blount Substation.** It is our understanding the MGE property on which the Blount generating station and Blount substation are located could be placed in the new Traditional Workplace District (TWD). According to Table 28 F1 of the proposed ordinance, "electric power production" is a permitted use in the TWD, but "electric substations" are a conditional use. It seems unusual that electric power production would be a permitted use, while a substation with fewer impacts would be a conditional use. We suggest both uses be identified as permitted uses in whatever zoning district Blount generating station and substation are placed.

2. **Emergency Electric Generators.** MGE would like to make sure the proposed zoning ordinance continues to recognize emergency electric generators are capable of providing energy for off-site use. The existing ordinance recognizes this in a number of sections (e.g., Sections 28.07[2][c]13.h. and 28.07[3][c]7.i), but the proposed ordinance does not. We suggest the definition of "emergency electric generator" in Section 28.03(2) of the proposed zoning ordinance be revised slightly to provide:

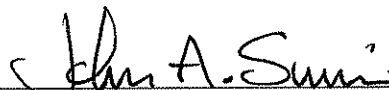
Emergency electric generator means an electric generator *capable of providing electricity for on-site or off-site use* powered by internal combustion engines which are fueled by gaseous fuels, gasoline, or distillate fuel oil whose purpose is to provide electricity if normal electrical service is interrupted.

We believe this minimal change will maintain the City's current recognition of the off-site attributes of emergency electric generators.

Please let me know if you have any questions or concerns about these comments. We would be happy to discuss them with you in person if that would be helpful.

Very truly yours,

MADISON GAS AND ELECTRIC COMPANY



---

John A. Sumi  
Legislative Affairs Manager

ah