

## DOCKETED

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| <b>Docket Number:</b>   | 16-OIR-02  |
| <b>Project Title:</b>   | SB 350 Barriers Report   |
| <b>TN #:</b>            | 213831   |
| <b>Document Title:</b>  | California Association of Realtors Comments: On SB 350 Barriers Study Draft Report |
| <b>Description:</b>     | N/A  |
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| <b>Organization:</b>    | California Association of Realtors   |
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*Comment Received From: California Association of Realtors*

*Submitted On: 9/29/2016*

*Docket Number: 16-OIR-02*

**On SB 350 Barriers Study Draft Report**

*Additional submitted attachment is included below.*



CALIFORNIA ASSOCIATION OF REALTORS®

September 26, 2016

California Energy Commission (CEC)  
Dockets Office MS-4  
RE: Docket No. 16-OIR-02  
1516 Ninth Street  
Sacramento, CA 95814-5512

**RE: SB 350 Barriers Study Draft Report**

Dear Director Oglesby,

Thank you for the opportunity to provide comments on the SB 350 Barriers Study Draft Report (Draft Report). The CALIFORNIA ASSOCIATION OF REALTORS® (C.A.R.) seeks to be a valuable contributor to studies involving single and multifamily housing. C.A.R. applauds staff on the extensive research and outreach and would like to comment on key issues raised in this Draft Report.

C.A.R. would like to commend the Draft Report for attempting to address the energy use data issue. Throughout the CEC's AB 1103, AB 758 and AB 802 hearings, C.A.R. has advocated for greater transparency when it comes to building and tenant energy use and recommends that the study include language that utilities, not tenants or building owners, are the energy efficiency experts and best equipped to handle data transmission issues. C.A.R. also supports the inclusion of the successes of net metering and virtual net metering in the SASH and MASH programs, as utilities have resisted including this methodology in the AB 802 CEC workshops.

While we appreciate the National Resources Defense Council's participation in this Draft Report, we respectfully disagree with comments provided on page 41 regarding rent control agreements. As noted, property owners must prioritize building upgrades based on safety and necessity. The imposition of any rent control agreements on properties as a condition of energy retrofit services would only result in a program failure. Landlords will be far less likely to install energy efficiency retrofits if they are in turn forced to give up private property rights in exchange. C.A.R. recommends that the Draft Report focus solely on multifamily buildings already subject to a deed restriction or affordability covenant with a public entity.

The CALIFORNIA ASSOCIATION OF REALTORS® looks forward to ongoing collaboration with the CEC and its staff on tackling the difficult task of understanding the barriers for low-income and disadvantaged communities to access energy efficiency investments.

Sincerely,

A handwritten signature in black ink that reads "Jennifer C. Svec".

Jennifer Svec,  
Legislative Advocate  
California Association of REALTORS®



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