

**DOCKETED**

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*Comment Received From: Nehemiah Stone*  
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**Stone Energy Associates - Clean Energy in Low-Income Multifamily Buildings**

*Additional submitted attachment is included below.*

## Stone Energy Associates Comments regarding “Clean Energy in Low-Income Multifamily Buildings”

May 30, 2018

Commissioners and Staff,

Thank you for holding this important meeting and for doing this important work for those most in need and least able to make the modifications necessary. This is an area near and dear to my heart and I hope to be able to help with addressing the issues. I have four suggestions today but will file comments later.

- Per a strong request from TCAC Executive Director Mark Stivers, please fund a validation study for the CUAC. Although it has been shown to be very accurate (compared to billing data) for most affordable MF projects, some data indicates that it is significantly less so for older existing buildings and for new construction in very hot regions (e.g., CZs 13, 14 and 15). The issue appears to be with the accuracy of the building performance software from which the heating and cooling estimates come. Those are inputs to the CUAC, rather than being calculated internally.
- Since tenant and investor confidence in the potential energy and bill savings from EE upgrades has been identified as one of the significant barriers to progress, the Commission should consider adding devices like the Nexi as a compliance option in the 2022 Standards update. The Nexi allows for monitoring to identify where energy is being used. As importantly, it has a simple five-color display to indicate to occupants how they are doing versus their monthly energy budget as well as instantaneously recognizing the largest end uses. Simple displays like that will have a much greater effect among low-income households than tables of data on a bill or computer screen. And colors do not pose a language barrier.
- One of the reasons there is a confidence gap is that software tools currently do not reflect the reality in multifamily buildings, especially low-income multifamily buildings. Is it truly reasonable to expect that households struggling with finances will have the same thermostat setpoints as the “average” household? When expectations of savings are based on a pre- and post-upgrade analysis that assumes a winter setting of 68° in both cases and the tenants were only able to afford 62° until the building was fixed, the expected savings will not materialize. That is neither the contractor’s fault nor the program’s fault. The CEC needs to commission a study to see what the typical setpoints are in affordable housing, and then make adjustments to the models.

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- To really move the multifamily market toward energy efficiency, we will need to give prospective renters information about the energy use in similar apartments. All else being equal, a renter would prefer lower utility bills. Home buyers get similar information from a HERS report. Potential buyers of multifamily buildings will soon be able to get building performance data through the new benchmarking program. However, the influence that will really motivate MF building owners to make upgrades is potential renters speaking with their feet. The CEC already has the basic tool that could be used – the CUAC. However, for it to be truly credible to potential renters, there will need to be a neutral third party – not the building owner, and preferably not the government – standing behind the accuracy of the numbers.

Sincerely,

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