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<b>Document Title:</b>	Greenworks Comments - RE Phase 2 Rulemaking Data Collection Regulations to Support New Analytical Needs; PACE Programs
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<b>Organization:</b>	Greenworks/Genevieve Sherman
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*Comment Received From: Genevieve Sherman*  
*Submitted On: 11/13/2020*  
*Docket Number: 19-BSTD-03*

**RE 18-OIR-01 Phase 2 Rulemaking Data Collection Regulations to Support New Analytical Needs; PACE Programs**

*Additional submitted attachment is included below.*



November 11, 2020

Commissioner McAllister  
California Energy Commission  
Docket Unit, MS-4  
Docket No. 19-BSTD-03  
1516 Ninth Street  
Sacramento, California 95814-5512

**RE: 18-OIR-01 Phase 2 Rulemaking  
Data Collection Regulations to Support New Analytical Needs; Property Assessed Clean Energy (PACE) programs**

Dear Commissioner McAllister:

Greenworks Lending (Greenworks) is writing to applaud the California Energy Commission's (CEC) recognition of PACE programs' contributions to California's energy savings and greenhouse gas emissions reduction targets. We understand that pursuant to Order No. 16-0113-05, the CEC wishes to develop and implement data collection protocols that will, among other things, incorporate information from PACE projects statewide.

Our company, Greenworks Lending, is a financing company that invests in commercial buildings through PACE. The commercial PACE (C-PACE) projects we have funded in California – from solar installations on private schools to deep energy efficiency retrofits of office buildings – have contributed to our national portfolio of over \$350MM invested in C-PACE funded building improvements. Greenworks Lending's founding team were the architects of the Connecticut C-PACE law and program design while at the Connecticut Green Bank and we are familiar with the importance of tracking program impacts.

Greenworks is in receipt of the proposed data regulations for PACE Programs included herein. Given the desire of the CEC to understand the impact of programs on energy savings specifically, we feel it is important that the CEC note the breadth of building improvements contemplated under enabling PACE statutes while finalizing the proposed data regulations and in reviewing data received annually from PACE programs:

- Enabling PACE statutes in California authorize financing for a variety of non-energy saving building improvements that confer a public benefit on the property – including water conservation, fire hardening, and seismic upgrades. While all eligible building improvements funded under PACE must meet statutory requirements, improvements under these categories may not impact energy consumption.
- A key value proposition of PACE is that it is a holistic tool property owners use to finance combinations of building energy improvements all under one program. It is common, for example, for commercial property owners to complete seismic hardening improvements at the same time as other energy efficient building envelope improvements.
- C-PACE programs are authorized to finance both the gut renovation or repositioning of facilities as well as the new construction of commercial buildings; in these instances the properties are typically vacant or underutilized prior to installation of improvements, so nominal energy consumption may increase after installation.
- Other eligible improvements such as EV charging stations may also increase onsite energy consumption.

The California Energy Commission may wish PACE programs to note the inclusion or presence of non-energy saving improvements as well as whether buildings are existing or new to assist CEC with calibrating data collected through these regulations. We welcome any questions you may have and thank you again for your invitation to participate.

Sincerely,

A handwritten signature in blue ink that reads "Genevieve Sherman".

Genevieve Sherman  
Head of New Markets & Products  
Greenworks Lending

**Section 1312 would house the new PACE Data**

**§ 1312. Energy Efficiency Program Data Collection from Non-Utility Programs**

Beginning in 2021, and every year thereafter, each PACE program administrator shall report no later than March 15 to the Commission its annual investments in energy efficiency programs for the previous fiscal year. The report shall include:

- (a) Program name: title or name of the PACE program (Example: mPower Placer);
- (b) Sector Indicator: flag to indicate the sector that the program targets (“R” for residential and “NR” for non-residential);
- (c) Project ID: a unique ID for each project implemented under the program;
- (d) Assessor’s parcel number (APN): the county name and assessor’s parcel number (APN) of the site at which the project was implemented;
- (e) Project address: the street address of the project.
- (f) Project Start Date: the date the project implementation was started in the mm/dd/yyyy format;
- (g) Project Completion Date: the date the project implementation was completed in the mm/dd/yyyy format;
- (h) Measure Types: the efficiency measure implemented, including but not limited to a) Lighting, b) Heating, Ventilation, and Air Conditioning (HVAC), c) Domestic Hot water, d) Enclosure (walls, windows, roof), and e) Self Generation including roof top PV ; and
- (i) Renewable Generation Indicator: to indicate whether the project included investments in self-generation projects.