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July 15, 2022

RE: Order Instituting Rulemaking to Investigate and Design Clean Energy Financing Options for Electricity and Natural Gas Customers (R.20-08-022)

To Commissioner Shiroma, Administrative Law Judges Toy and Park, and all parties to R.20-08-022,

At our July 15, 2022 meeting, the Disadvantaged Communities Advisory Group provided the following recommendations to evaluate the Clean Energy Finance proposals.

Unless otherwise specified, residential includes single-family homes, multi-family homes, and rental domiciles and non-residential includes industrial, commercial, government, non-profit, non-residential, or community systems; financing includes all clean energy financing (e.g., tariff on-bill, on-bill financing, and on-bill repayment); these recommendations apply to all entities providing plans and financing.

1. Dramatically expand the eligibility under the proposed financing mechanisms from energy efficiency to include other types of clean energy storage and technologies and systems components related to that (e.g., panel upgrades, electric vehicle infrastructure, and any other upgrades required to handle electrified appliances).
2. Enable proposals to combine different technology types under a single financing mechanism and have that ability applied to residential/commercial, and community scale projects (e.g., microgrids).
3. Ensure that programs include protections to deal with situations where customers might be at risk of disconnection.
4. Resources should be provided to enable outreach to tenants in a language they understand to ensure protections/benefits.
5. Both landlord and tenant must expressly consent to project/mechanism. Landlords will be responsible for out-of-pocket expenses beyond those mutually agreed to (e.g., operations & maintenance, warranty work, copays).
6. Technical assistance should be provided both for education and adoption and for quality assurance (including bill savings analysis for each home such that the bill is affordable).
7. Credit histories and income ratios should not be considered in the application process. Instead, eligibility will consider utility bill payments, a payment history with thoughtful consideration of any arrearages (e.g., during Covid-19) and potentially sufficient ability to pay the monthly bills related to the proposed financing mechanisms.
8. Expand the proposed financing mechanisms with 0% interest, unsecured loans with no application fees.
9. Do not exclude applicants with prior defaults/disconnections.
10. Do not delay rollouts in low-income or disadvantaged communities.

Sincerely,

/s/

Roger Lin
on behalf of the Disadvantaged Communities Advisory Group