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*Comment Received From: Collin Tateishi*  
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*Docket Number: 18-IEPR-08*

**CHPC's Recommendations for the CLIMB Action Plan**

Document attached.

*Additional submitted attachment is included below.*



June 12, 2018

Mr. Eugene Lee  
Residential Supervisor  
Existing Buildings Office  
California Energy Commission  
1516 9<sup>th</sup> Street, MS-26  
Sacramento, CA 95814

**RE: Recommendations for the Clean Energy in Low-Income Multifamily Buildings Action Plan**

Dear Supervisor Lee,

The California Housing Partnership Corporation (CHPC) is a leading expert on affordable housing policy and finance in California. This includes technical and policy expertise on low-income renter and affordable housing participation in clean energy, solar, energy efficiency, and water conservation programs such as those regulated by the California Energy Commission (CEC). CHPC established the Green Rental home Energy Efficiency Network (GREEN) in 2010 to collaboratively increase access to energy efficiency, renewable energy, and water conservation resources for low-income renters and affordable housing properties. GREEN includes more than 50 nonprofit affordable housing organizations and public housing authorities throughout California that use environmental sustainability to preserve affordable homes and improve quality of life for low-income renters.

CHPC applauds CEC's leadership to improve clean and affordable energy options that can reach multifamily affordable housing properties and low-income renters. We support the Clean Energy in Low-Income Multifamily Buildings (CLIMB) Action Plan and respectfully provide the following recommendations:

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**Priority #1: Support legislative action to enable existing solar programs to bring the benefits of clean energy to low-income renters in new multifamily affordable housing properties.** The New Solar Homes Partnership (NSHP) program is about to expire, but new buildings are not eligible for the upcoming Solar on Multifamily Affordable Housing (SOMAH) program. NSHP, which targeted both market-rate and affordable multifamily housing properties, should be extended to exclusively support new multifamily affordable housing properties and low-income renters. As an alternative, SOMAH eligibility requirements should be updated to support both new construction and retrofit projects while continuing to target multifamily affordable housing properties and low-income renters. SOMAH is currently limited to retrofits.

**Priority #2: Help establish a stable funding source for the Low-Income Weatherization Program (LIWP).** LIWP for large multifamily properties is a successful energy efficiency and solar retrofit program that overcomes participation barriers for multifamily affordable housing properties and low-income renters. It can inform how other energy and climate programs are designed and implemented. As a leveraging source, LIWP can also be used to help CEC and investor-owned utilities finance more projects.

**Priority #3: Recommend third-party program administrators as a best practice for energy and climate programs that target multifamily affordable housing properties, low-income renters and disadvantaged communities.** Independent administrators can effectively manage the development, administration and delivery of programs through a transparent, competitive and inclusive process. LIWP and SOMAH use a single, statewide and third-party program administrator. They incentivize energy-saving improvements and renewable energy benefits for multifamily affordable housing properties and low-income renters throughout California. They provide technical assistance across multiple utility service territories to leverage federal, state and local program funds, rather than only coordinate resources within a single service territory. Third-party administrators address participation barriers for low-income customers by incorporating feedback from stakeholders and outreach partners that are trusted in the communities they serve. Competitive solicitations help ensure that third-party program administrators are chosen to optimize investments in a fair and efficient process.

**Priority #4: Fund research on tenant benefit and consumer protection principles for energy and climate programs.** Research should target multifamily affordable housing properties and low-income renters that benefit from state and local programs. These programs provide health and financial benefits, but may inadvertently displace low-income renters through rent increases. Research on tenant benefits, protections and displacement pressures can inform the adoption, implementation and enforcement of tenant benefit and consumer protection tools such as performance agreements and guarantees. These tools can help programs and policies ensure that customers truly benefit from energy and climate investments.

Thank you for your leadership and the opportunity to provide recommendations on CEC's CLIMB Action Plan.

Respectfully submitted,

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