

DOCKETED	
Docket Number:	19-BSTD-03
Project Title:	2022 Energy Code Pre-Rulemaking
TN #:	235452
Document Title:	Twain Financial Partners - Fran Doherty Comments - Title 20 PACE 18-OIR-01 Phase 2 Rulemaking
Description:	N/A
Filer:	System
Organization:	Twain Financial Partners - Fran Doherty
Submitter Role:	Other Interested Person
Submission Date:	10/29/2020 10:28:55 AM
Docketed Date:	10/29/2020

Comment Received From: Twain Financial Partners - Fran Doherty
Submitted On: 10/29/2020
Docket Number: 19-BSTD-03

Title 20 PACE 18-OIR-01 Phase 2 Rulemaking

I participated on a preliminary call on 10/20/2020 regarding proposed data collection efforts by CEC regarding PACE transactions in California. I work for Twain Financial Partners, which is a capital provider for commercial PACE projects in California and around the country. The most efficient way to collect the proposed information, at least on the commercial side, would be through the JPA's such as CSCDA and WRCOG that work with the capital providers on every transaction. The JPAs already require an application with each transaction that captures most of the information that the CEC is looking to obtain. It would only take a few minor adjustments to those applications to make sure all the information was captured. This would help CEC make sure that they receive everything they are looking for in a consolidated and standardized format. It would also ensure that the capital providers themselves are not burdened with additional, duplicative administrative work.