

DOCKETED

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Self-Help Enterprises comments on BUILD program guidelines

On behalf of Self-Help Enterprises (SHE) we respectfully submit the following comments on the proposed Building Initiative for Low-Emissions Development (BUILD) Draft Program Guidelines:

• New Adopter Design Award

o SHE suggests 2.a. be changed from "that have never received a permit for the development and construction of an all-electric" to "that have never received Certificates of Occupancy for the development and construction of an all-electric"

o Increase the maximum New Adopter Design Award to at least \$50,000

• Program Participation

o SHE recommends the Incentive Reservation Term be increased from 18 months to 24 months

• EM&V

o SHE is concerned that the proposed EM&V Requirements will have a negative impact on the program as the requirements will be too difficult to implement (as has been our current experience working through an EPIC Realize pilot project)