



Citizens for Pennsylvania's Future
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March 19, 2012

Mr. Alfred Pollard
General Counsel
Federal Housing Finance Agency
400 7th St., N.W.
Washington, DC 20024

RE: RIN 2590-AA53 PACE programs

Dear Mr. Pollard:

Citizens for Pennsylvania's Future (PennFuture) is a state wide public interest organization that works on clean energy, energy efficiency, and a host of other environmental and energy issues that impact the public health of Pennsylvanians and our state's economy. It is with this mission that we strongly urge you to reconsider your opposition to Property Assessed Clean Energy (PACE) programs.

The PACE tool has the ability to stimulate local economies, deploy distributed energy generation, provide a mechanism to finance home efficiency improvements, lower energy bills and can help drive us toward a cleaner energy future.

Pennsylvania did not have a PACE program in place when the FHFA made its 2010 ruling. However, it is the position of PennFuture that PACE programs could have a positive impact on our state's health and economy, if implemented. We have supported the introduction of several pieces of state level legislation that would give taxing jurisdictions the ability to enact PACE programs in Pennsylvania.

PACE is a valuable assessment tool that would enable homeowners to make critical home improvements to our state's aging housing stock. These improvements will help reduce energy costs and will contribute to a cleaner environment.

We see great potential in the ability for PACE programs to stimulate Pennsylvania's local economies. For example, according to a May 2011 Department of Energy study, the Boulder County PACE program in Colorado created over 120 jobs, generated more than \$20 million in overall economic activity and reduced consumers' energy use by more than \$125,000 in the first year alone.

We recommend that FHFA adopt a rule stipulating that Fannie Mae, Freddie Mac, and any other mortgage lenders regulated by FHFA be allowed to buy residential mortgages with PACE assessments that are originated by programs that conform to standards and guidelines such as those established in federal legislation HR 2599 (The PACE Assessment Protection Act).

Sincerely,



Evan R. Endres

**Project Coordinator;
Solar Energy, Energy Efficiency, and Alternative Fuels**