

From: Bruce Plenk <Bruce.Plenk@tucsonaz.gov>  
Sent: Monday, March 26, 2012 9:41 PM  
To: !FHFA REG-COMMENTS  
Cc: Kieran Sikdar  
Subject: RIN 2590-AA53

Please accept the following comments regarding PACE financing programs:

- Q1: No
- Q2: So long as it is clear that only the amount in default on the PACE program (not the entire balance owed) is a lien, banks and mortgage companies do not need any additional risk protection
- Q3: The risk is low
- Q4: The risk is low, since only the amount in default is at issue
- Q5: The options for alternative financing vary greatly and do not run with the property generally. None have first lien status. PACE is important especially in locations where other options are not available
- Q6: No significant difference.
- Q7: No significant difference
- Q8: Many projects, especially purchase of renewable energy systems cannot be financed in other ways. PACE makes this possible. Many surveys have shown lack of up-front funds to be a significant barrier to "going solar."
- Q9: Consumer protections vary but full disclosure is required to run a transparent program
- Q10: Minimal effect
- Q11-13 Minimal effects from any of these scenarios

Thank you for the opportunity to comment. I hope that you will eliminate the restrictions in your July 6, 2010 and February 28, 2011 Statement and Directive and allow local states and jurisdictions to determine the parameters of each PACE program. It is an important tool to help us reach affordable solar deployment on a wide scale.

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