



March 26, 2012

Mr. Alfred M. Pollard, General Counsel  
Federal Housing Finance Agency  
**Attn: Comments/RIN 2590-AA53**  
Eighth Floor  
400 Seventh Street, SW  
Washington, DC 20024

Re: Comments of the Florida Retail Federation in Support of PACE Programs, FHFA Advanced Notice of Proposed Rulemaking, RIN 2590-AA53

Dear Mr. Pollard:

The Florida Retail Federation urges the Federal Housing Finance Agency (FHFA) to take all available steps that will allow PACE – Property Assessed Clean Energy – programs to move forward as rapidly as possible. These steps include reversing the FHFA’s July 2010 directive that has frozen PACE programs across the Nation and adopting rules that will facilitate the rapid and broad deployment of PACE programs and the energy-saving measures that will be implemented and deployed through those programs. Although the Federation’s immediate interests lie in the State of Florida, it is clear that not only Florida, but every state in our Nation must reduce our dependence on imported fuels, and that we must do so as efficiently and cost-effectively as possible. This is a critical matter for ensuring America’s national security.

The Florida Retail Federation is a statewide organization with more than 7,500 members ranging from the largest retail grocery, department, pharmacy, electronics, and appliance chain stores to literally thousands of individual “Mom & Pop” sole proprietorships. We participate actively regarding energy issues in Florida, encouraging the development and implementation of the most cost-effective supply-side and demand-side resources for meeting the energy needs and wants of Florida’s businesses and citizens. The members of the Federation not only care about meeting our own energy needs most cost-effectively, we also care deeply about promoting and ensuring the ability of individual citizens to obtain needed energy services at the lowest possible cost, for the obvious reason that doing so is good for Florida’s economy and the U.S. economy as a whole.

PACE programs provide a meaningful and effective means for getting both energy efficiency and end-use-level renewable energy measures in place to accomplish the critical economic and national security goals of meeting our energy needs most cost-effectively and of reducing our dependence on imported and non-renewable fuels that are subject to significant price volatility, which inhibits economic growth and stability. Stated simply, PACE programs make it feasible and affordable for individual citizens to implement energy efficiency measures (such as insulation, energy-saving windows, reflective roofing, and other building envelope improvements) and renewable energy measures (such as solar thermal water heating and solar electric systems).

While I do not claim to be an expert in housing economics, it seems fairly obvious that homes with greater energy efficiency will have lower energy bills, and that such homes will have higher resale value. Moreover, we are aware of studies that document the benefits of enhanced economic activity spurred by PACE programs, and of other information showing that the default rates for PACE properties are much

lower than the default rates for all housing. This leads me to conclude that owners of properties that have been enhanced by PACE-supported energy efficiency improvements are much less likely to default on their loans, which in turn provides significant security benefits to mortgage lenders. Moreover, as a matter of good public policy, the general economic stimulation benefits and the energy security benefits provided by PACE-supported energy improvements must be considered in forming the FHFA's policies and rules regarding PACE programs.

In summary, the Florida Retail Federation strongly supports PACE programs and urges the Federal Housing Finance Agency to reverse its July 2010 directive that has effectively frozen PACE programs, as well as to adopt rules that will facilitate the rapid and nationwide implementation of PACE programs and thus the realization of the many benefits that they will provide. These benefits include additional support for the Nation's economic recovery and the long-term health of the Florida and U.S. economies that will result from enhanced energy and economic security. Hundreds of communities in the 27 states that have adopted PACE-enabling legislation – including Florida, through Section 163.08, Florida Statutes – are ready to move forward with energy-saving programs and measures that will contribute meaningfully to our Nation's economic health and security.

Thank you very much for your consideration of the Florida Retail Federation's comments, and for the FHFA's prompt action to restore and facilitate PACE programs across the United States.

Sincerely yours,



Rick McAllister  
President and CEO