Comments by High Country Conservation Center, Frisco, CO Based on our local PACE program developed in partnership with Summit County Government and Town of Breckenridge (970) 668-5703

Q1

We do not believe restrictions are appropriate. Local governments, Summit County Government and Town of Breckenridge, have the right to establish and maintain special assessment districts for community benefit. They also should have the right to decide locally what is and is not is a benefit to the community for such a special assessment district. Greenhouse gas reductions have been clearly named as a community benefit and priority in the county-wide energy plan (Summit County Energy Plan, 2011). This plan has a broad base of community support. There was a great deal of interest in the PACE program local partners developed in 2010. We had accepted and approved 10 assessments when we had to put a stop to the program due to FHFA interference. The program would have lowered local energy costs per household, reduced green house gas emissions, and revitalized out local energy retrofit workforce.

Q3

In Summit County, the administration and processing fee is paid by the County. The entire loan amount is available for home improvement. In the Town of Breckenridge, a \$300 administrative fee is assessed and may be rolled into the loan. This is between 2-6% of total loan amount. Loans range from \$5000 - \$15,000.

Q5

In our area, we do not believe that there is a comparable loan-alternative. Home equity lines of credit and home equity loans are available but generally have higher interest rates than our local PACE program, which is financed by County money. The interest rate offer through our PACE program is 4%. The low interest rate, easy administration and simple underwriting criteria make the program attractive to home owners. On-bill financing is not available in our area.

08

There are several reasons why PACE assessments provide an other-wise unavailable option to local residents:

- 1. PACE assessments provide a low-interest option for local Summit County residents. Because money is locally provided (by our local governments) with very little administration needed, the interest rate is 4%, less than any other available alternative.
- 2. Payment and processing is easy. Local infrastructure is already in place for property tax payments. Processing is completed within two weeks.
- 3. Underwriting guidelines are based on the applicant's three-year history of property tax payment and the cost effectiveness of the proposed energy upgrade.

Q15

The 2010 Summit County PACE program:

- Homeowner applicants cannot have been delinquent on property taxes in the last three years. Applicants must be Summit County residents.
- Applicants must have an energy audit by a certified Building Performance Institute (BPI) Energy Analyst.
- The prospective home improvement must be a priority item listed on the energy audit. Cost effectiveness of the proposed upgrade must be analyzed by a Building Performance Institute Energy Analyst.

- The following variables are analyzed for proposed upgrades: annual savings, savings to investment ratio (SIR), and simple payback. The proposed project must be deemed cost effective. SIR must be greater than 1. SIR calculation ensures the proposed energy upgrade will return investment (through energy savings) during the lifetime of the system. Current analysis software is commonly used by home energy professionals, entitled Optimiser.
- Applicants must attend an energy efficiency workshop.
- Local energy tracking data is available that provides evidence to support energy savings projections. Regional and national reports are also used in making projections.
- A Home Index Rating (HER), while not incorporated into the 2010 Summit County PACE program, could be a useful tool if the program were re-opened in the future programs. RESnet HERs ratings are conducted by independent, certified raters with tested analysis software.