Clean Energy Finance Workshop

Proceeding 20-08-022

Workshop will start at 9 AM



California Public Utilities Commission

Workshop Logistics

- Panels are 75 minutes 1 hour presentation, 15-minute panel Q&A
- Public Comment at the end of each day 15-minute moderator lightning round followed by 45-minute Public Comment
- Workshop will be recorded and be included in the record for R. 20-08-022 link will be available at http://www.adminmonitor.com/ca/cpuc/
- There is a delay between the telephone audio and the Webinar broadcast
- For any technical issues with the Webinar, please call the Technical Support Line at 415-703-5263

Panel 1 – 9:15 – 10:30

- Moderator: Holmes Hummel, Clean Energy Works
- Wesley Holmes, Southeast Energy Efficiency Alliance
- Jeff Schub, Coalition for Green Capital
- Miriam Joffe-Block, CAEATFA Senior Manager, California Hub for Energy Efficiency Financing (CHEEF)

Clean Energy Financing Workshop

CPUC Rule-making 20-08-022

PANEL ONE What have we learned from 10+ years of finance activities?

Markets served and unserved, scale of private and public funds, lessons learned, and recommendations

> Holmes Hummel, PhD Executive Director Clean Energy Works

> > January 28, 2021

2010-2013: CPUC orders funding for on-bill financing pilot programs

- > CPUC commissioned a preliminary assessment on energy efficiency financing, and resulting report presented specific terms for a <u>consumer loan</u> as the "characterization of ideal finance product."
- > CPUC later authorized ratepayer funding for residential <u>and</u> non-residential pilot programs based on loans.
- Utilities were able to proceed with making loans to non-residential customers, but <u>not residential</u> customers, where underserved market segments (e.g. rental properties, low-income) are very large.
- Of the \$70M total, ~\$25M for residential was referred to the California Alternative Energy and Advanced Transportation Finance Authority (CAEATFA) in the State Treasurer's Office.
- In 2014, CAEATFA then established the California Hub for Energy Efficiency Finance (CHEEF), which later launched the Residential Energy Efficiency Loan (REEL) program and two more programs for IOU customers.
- > What financing activity developments in the interceding decade help provide context for today's workshop?

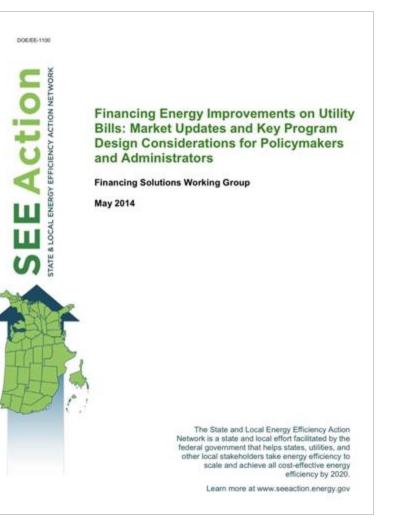
2014: U.S. Dept of Energy releases report on "Financing Energy Improvements on Utility Bills"

The study reviewed 30 utility programs, finding that all but 1 provide consumer loan products.

Federal and state regulations that protect consumers from lenders also obligate the programs to *systematically disqualify* people with criteria that commonly include income, credit, and renter status.

The DOE study found <u>one exception</u> among the 30 cases:

A utility in Kansas offered more inclusive tariffed terms for site-specific investments with site-specific cost recovery through a charge on the bill that was less than the estimated savings.



2015: Utilities in North Carolina and Arkansas follow Kansas, Kentucky, New Hampshire, and Hawaii to offer tariffed on-bill investments

One utility with experience with both on-bill loans and tariffed on-bill investment reported initial results:

- > A majority of customers who receive an offer for the utility to pay for cost effective upgrades under tariffed terms accept it, assuring cost recovery for the utility and a path to ownership for the customer.
- Virtually all multi-family renters in the Arkansas case receive an offer for upgrades on tariffed terms, and all accept.
- > The average size of the upgrade project doubles as the utility expands the eligible scope of projects.

In the same year, American Council for an Energy Efficient Economy (ACEEE) held its Finance Forum in San Francisco, and ACEEE later published more data from utilities with experience in its proceedings for the 2018 Buildings Summer Study also held in California.

2016: Residential Energy Efficiency Loan (REEL) makes its first loan

We'll hear more about this program in two panels.

With more than 1 year for CPUC funding to reach CAEATFA and 1.8 years to reach the first loan, this milestone shaped the timeline ahead as well:

It started a 2 year clock before the evaluation scope and selection of contractor would be negotiated.

What is GoGreen Financing?

Whether you want to reduce energy usage, improve the comfort and health of your home or business, or just want to "go green," you can find the solution you need. GoGreen Financing serves three broad property types.



Choose your property type





Small business

Residential Financing for homeowners and renters

Affordable multifamily Financing for affordable multifamily building owners

Financing for small business property owners and tenants

RESIDENTIAL

AFFORDABLE MULTIFAMILY

SMALL BUSINESS

Administered by the state with the support of the utilities.

The California Public Utilities Commission authorized the California investor-owned utilities (PG&E®, SDG&E®, SCE® and SoCalGas®)* to collaborate with certain state agencies in the development of energy efficiency financing programs and to assist in building awareness about them. Consumers are encouraged to explore lending options for the financing of energy improvements that can make homes and businesses more efficient and comfortable.



		Public assistance programs Some California programs provide no- cost options for qualified candidates. Visit this info page to learn more.		
Find financing	Find a contractor			
Ready to explore financing options for your energy improvement project? Search and compare options.	Want to find a contractor for your energy efficiency project? Search for participating contractors.			
FIND FINANCING	FIND A CONTRACTOR	LEARN MORE		

2016: SB350 mandates the CEC to produce a landmark report on Barriers to Low-Income Customers

Recommendation on financing:

"The CPUC should consider developing a tariffed on-bill pilot for investments in energy efficiency that targets low-income customers regardless of credit score or renter status, and that do not pass on a debt obligation to the customer.

Utilities could use the program to make energy upgrade investments and recover the cost through the bill, so long as the recovery charge is less than the estimated savings.

The Energy Commission should encourage and provide technical assistance to POUs and other load-serving entities seeking to implement a tariffed on-bill pilot." California Energy Commission
COMMISSION FINAL REPORT

Low-Income Barriers Study, Part A: Overcoming Barriers to Energy Efficiency and Renewables for Low-Income Customers and Small Business Contracting Opportunities in Disadvantaged Communities

California Energy Commission Edmund G. Brown Jr., Governor



December 2016 | CEC-300-2016-009-CMF

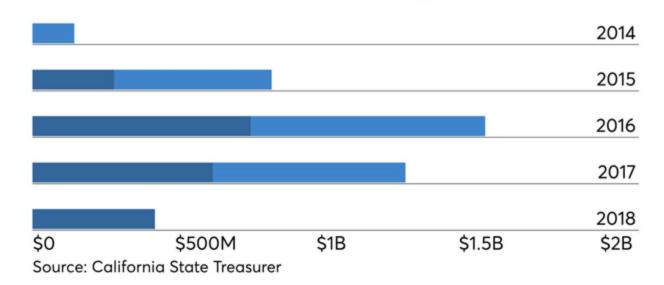
2018: Property Assessed Clean Energy (PACE) Loans Decline

Lien-backed loans had attracted billions in investment.

By 2020, some of the largest PACE vendors filed for bankruptcy, citing new consumer protection rules to lower loan volumes.

Slower PACE

Origination in California, as measured by enrollment in a program designed to compensate mortgage lenders for losses, is on the decline



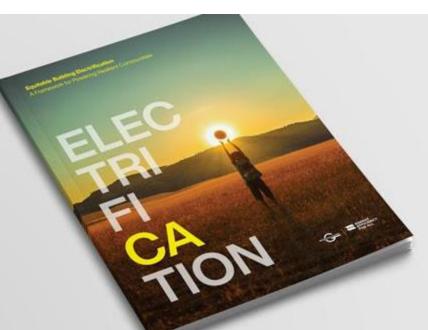
Published in American Banker, Feb 15, 2019.

2018: 100% clean electricity (SB100) + building decarbonization (SB1477)

Equitable Building Electrification framework, released by Greenlining Institute and Energy Efficiency for All, calls for supporting ESJ households through alternative financing such as tariffed on-bill investments.



In following year in 2019, the Building Decarbonization Coalition convened a stakeholder process to chart a policy roadmap called *Towards an Accessible Financing Solution*,



which recommends tariffed on-bill investment combined with complementary funding.

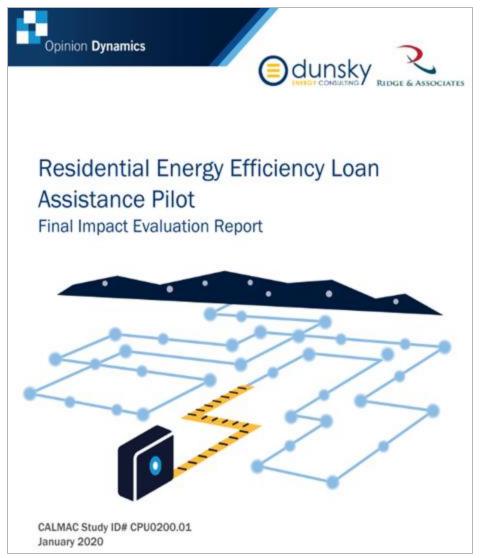
CPUC's implementation path in 2018 for the San Joaquin Valley proceeding (R15-03-010) and in 2019 for SB1477 led to funding for pilot programs, including some with a financing component taking shape in the field now.

April 2020: CPUC receives final evaluation of the Residential Energy Efficiency Loan program

Among 212 homeowners served in the first two years, 1/3 were "underserved" as defined by CalEnviro Scores, and 8% were credit challenged (score below 640).

Loan volumes increased after the evaluation period, and the High Growth scenario evaluated in the report would reach ~0.01% of IOU customers per year.

CPUC resolved to make the program permanent, deferring some decisions about how to fund continuation.



August 2020: CPUC orders a new rule-making on clean energy finance (R20-08-022)

"As we look to expand clean energy financing strategies, the Commission will look to ensure that new options will be **accessible to populations that face issues of creditworthiness and barriers to accessing affordable capital**."

"These strategies will be informed by existing efforts to ensure equitable access to clean energy. An example is the **Low-Income Barriers Study** initiated pursuant to Senate Bill 350 (De León, 2015)."

Today's Workshop is the next step on the path to implement the CPUC's order to institute a new rulemaking on clean energy financing.





Environmental and Social Justice Action Plan

2019: Final Version 1.0

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Goal 1: Consistently integrate equity and access considerations throughout CPUC proceedings and other efforts					
Goal 2: Increase investment in clean energy resources to benefit ESJ communities, especially to improve local air quality and public health					
Goal 3: Strive to improve access to high-quality water, communications, and transportation services for ESJ communities					
Goal 4: Increase climate resiliency in ESJ communities					
Goal 5: Enhance outreach and public participation opportunities for ESJ communities to meaningfully participate in the CPUC's decision-making process and benefit from CPUC programs					



Pursuing Scale in

Clean Energy Investment in the Residential Sector

Wesley Holmes Director of Strategy and Development January 28, 2021 The Southeast Energy Efficiency Alliance (SEEA) promotes energy efficiency as a catalyst for economic growth, workforce development and energy security across 11 southeastern states including Alabama, Arkansas, Florida, Georgia, Kentucky, Louisiana, Mississippi, North Carolina, South Carolina, Tennessee and Virginia.

Areas of Work



Energy Efficiency Policy Built Environment Energy Efficient Transportation Regional Investments

SEEA works to expand the availability and accessibility of capital to make energy efficiency investments.

Southeast EE Fund Investments (2014-2018)

- Abundant Power Commercial Loans (NC)
- Renew Financial (WHEEL) Residential Loans (FL)
- Sunstate Federal Credit Union Residential Loans (FL)
- Kentucky Housing Corporation EE loan program
- MACED Kentucky On-Bill Program
- Jax Metro Credit Union Residential Loans (FL)

EE Finance Activities

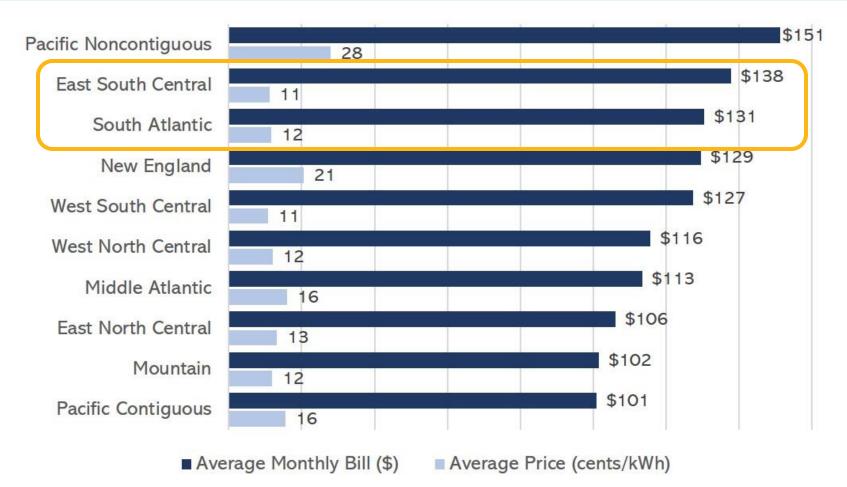
- 2014 Arkansas Energy Office Statewide Financing Options Study
- 2014 North Carolina On-Bill Working Group
- 2017 SEEA Learning Circle for Inclusive Financing
- 2018 Co-hosted first national convening on rural EE with ACEEE
- 2019 Southeast Tariffed On-Bill Cohort
- 2020 Utility Guide to Tariffed On-Bill Programs



What have we learned from 10+ years of finance activities?

Solutions that work for anyone – regardless of income, credit score, or renter status – are better for everyone.

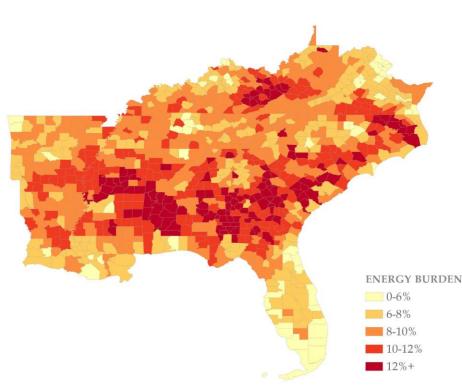
The Southeast has the lowest energy rates, but among the highest residential utility bills.



Data: Energy Information Agency (EIA) Residential Energy Consumption Survey (RECS), 2015. Chart: William D. Bryan.



The Southeast has the highest rates of energy burden in the United States.

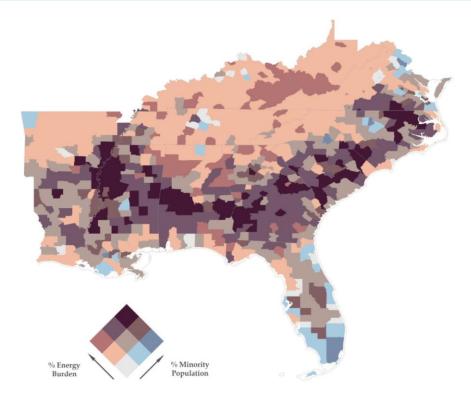


- 1 out of 3 people in the South struggle to pay their bills month to month.
- 15.4 million households (35%) report experiencing any energy insecurity, the most of any region in the United States.
- 7.5 million households (17%) are estimated to have received disconnection or stop service notices.
- 5 million households (11%) have had to leave their home at an unhealthy temperature because of the cost of energy.
 - 3.9 million households in the South (9%) lack access to working cooling equipment in their homes, putting them at an elevated risk for heat-related illness.

Data: (2020) Low Income Energy Affordability (LEAD) Tool, U.S. Department of Energy. Maps: William D. Bryan.



Like so many consequences of poverty, this burden is not shared equally.



- Black Americans pay more for their energy than any other group in the United States, even when other factors are taken into consideration.
- The legacy of residential segregation continues to exclude communities of color from healthy and affordable housing.
- Low-income households and people of color pay a higher financial and medical price to power their homes than everyone else.

Data: (2020) Low Income Energy Affordability (LEAD) Tool, U.S. Department of Energy. Maps: William D. Bryan.



Understanding "On-Bill" Terminology

On-Bill Financing (utility loan) & On-Bill Repayment (3rd Party Loan)

Tied to the property owner

Available only to property owners

Traditional loan underwriting

No utility service disconnection

Generally not transferable

Tariffed On-Bill Investment

Tied to the meter

Available to any utility customer

Utility does not extend consumer credit

Disconnection for non-payment

Automatically applicable to successor customer



An investment in residential energy upgrades is an investment in the energy system.

Tariffed on-bill programs treat improvements to the energy performance of homes and buildings as an investment in system reliability and as a development of lower cost distributed energy resources, such as energy efficiency. The utility employs its established authority to make investments and seek cost recovery through tariffs using existing mechanisms for issuing bills and collecting revenue.





HECO and electric cooperatives first received utility commission approval, and in 2020, commissions approved programs in Missouri and Georgia.

	Midwest Energy (KS)	MACED (KY)	Ouachita Electric Cooperative (AR)	Roanoke Electric Cooperative (NC)	Appalachian Electric Cooperative (TN)
Start Date	2008	2011	2016	2017	2019
Upgrade Package	Wx, HVAC	Wx, HVAC	Wx, HVAC	DI, Wx, HVAC, DR	Wx, HVAC
Customers Reached	4.8%	0.2%	6.2%	8.5%	0.2%
Offer Acceptance Rate	70%	78%	90%	90%	90%, no-pay 77% (Overall)
Average Upgrade Package Size (\$)	\$5,965	\$7,500	\$6,300	\$7,650	\$8,550
Average Annual Savings* (Est. / Evaluated)	20% \$668	18% \$519	26% \$644	23% \$709	24% \$629
Average Monthly Energy Savings (\$)	\$55.67	\$43.25	\$55.33	\$50.08	\$52.42
Average Monthly Tariff (\$)	\$44.53	\$34.60	\$44.26	\$47.26	\$41.93
Charge-offs	<0.1%	<0.4	Zero	Zero	Zero



Source: Energy Efficiency Institute, 2019:

http://www.eeivt.com/wp-content/uploads/2019/05/2019-PAYS-Status-Updates.pdf

Tariff on-bill investments have outperformed loans in multiple metrics.



- Located in Southwest Arkansas Delta Region
- 8500 meters, mostly Residential
- Housing stock between 50 and 100 years old
- Average household median income of ~\$29K (AR average is~\$42k.)
- Provided Home Energy Loan Program (HELP) from April 1, 2015 – December 31, 2015
- Converted to tariff model HELP PAYS in April 2016

Participation Tripled

- HELP (Loan) Apr Dec 2015
 - 70 Single Family Homes
- HELP PAYS (Tariff) Apr Dec
 2016
 - 118 Single Family Homes
 - 82 Multifamily Units
 - 2 Commercial

Average Investment Doubled

- HELP = \$2,280
- HELP PAYS = \$5,600

Total Investment Tripled

- HELP = \$500,000
- HELP PAYS = Over \$1.6 Million



Source: Ouachita Electric Cooperative Corporation

Tariffed on-bill terms reach the "hardest to reach" communities.



- Located in Northeast North Carolina
- 14,500 meters, mostly Residential
- Average household median income of ~\$39K (NC average is ~\$47k.)
- 48% spend over \$200/month (30% is National Co-op average)
- Provided loan program in 2014
- Converted to tariff model (Upgrade to Save) in July 2015

Participation Increased

- Loan Program Enrollment
 - 1000 targeted/15% Showed interest
 - "Handful" qualified/ < .1% participated
- Upgrade to Save Enrollment
 - 250 Single Family Homes

Average Investment Change

- Loan Program = \$0
- Upgrade to Save= \$7,200

Service Area Total Investment Change

- Loan Model = \$0
- Upgrade to Save= Over \$1.5 Million



What have we learned from 10+ years of finance activities?

The pursuit of scale is the pursuit of equitable access.

Thank You



SMART ENERGY. STRONG ECONOMY. FOR ALL.

WWW.SEEALLIANCE.ORG

Areas of Work



Energy Efficiency Policy Built Environment Energy Efficient Transportation Regional Investments

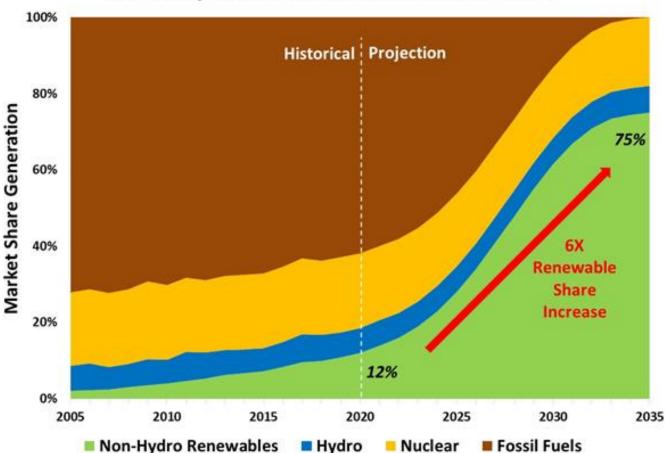


Accelerating Clean Energy Deployment with Catalytic Public-Private Investment: Lessons from Green Banks

Jeffrey Schub jeff@coalitionforgreencapital.com *Coalition for Green Capital January 2021* How far do we have to go? We have a LOOONG way to go. Nationally need about \$200B investment of climate investment per year for 20 years

FOR EXAMPLE:

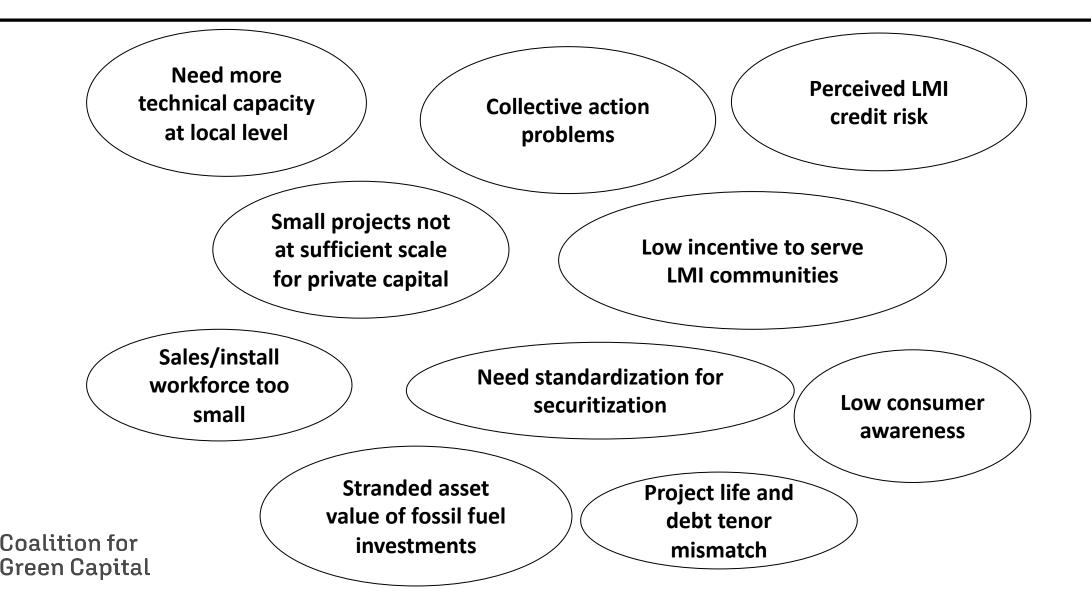
- How much has US achieved in power sector?
 - Non-hydro RE market share grown from 2% to 12% in last 15 years
- How much more must we do?
 - Non-hydro RE must grow from 12% to ~75% in next 15 years – <u>6x increase</u>
- What About CA transpo sector?
 - ~250k EVs out of 15M registered vehicles
 - 2% down, 98% to go.



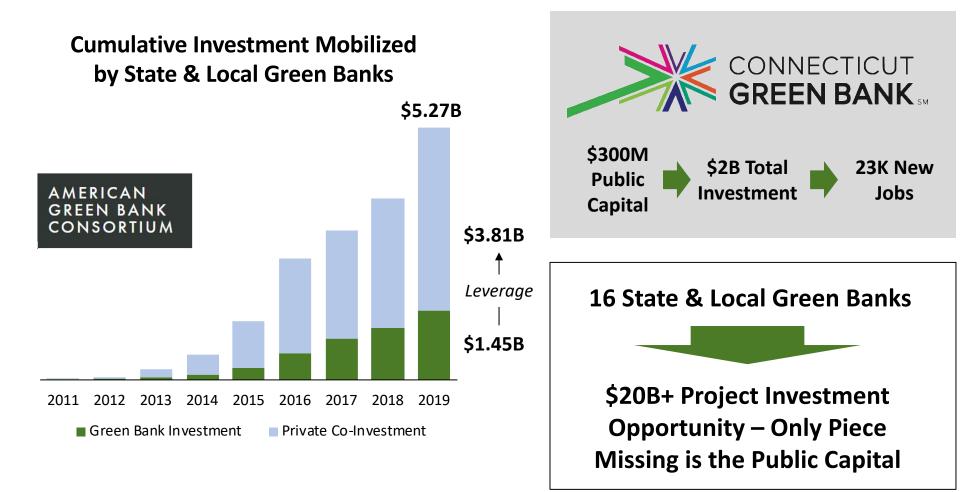
Electricity Fuel Mix to Meet Biden 2035 Goal



Sources: https://afdc.energy.gov/data/10962; https://www.statista.com/statistics/196010/total-number-of-registeredautomobiles-in-the-us-by-state/ Myriad of business and capital problems create barriers to rapid market penetration of proven technologies

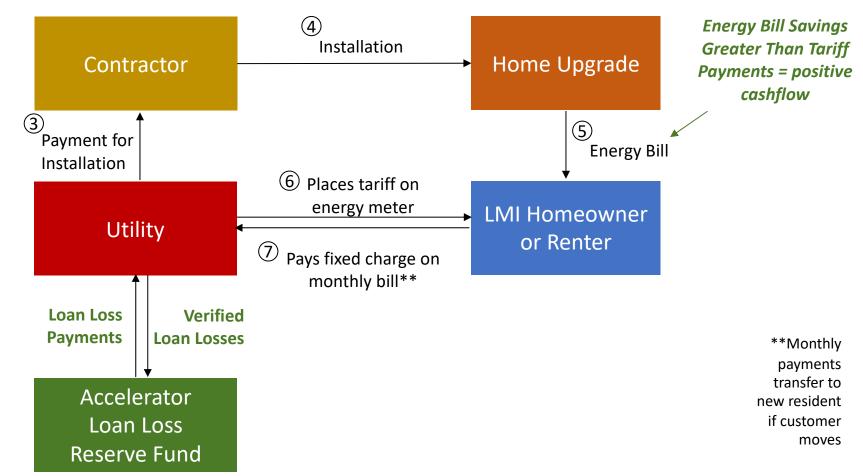


Green banks are proven institutional model for catalytic investment; \$5B+ investment to date; thousands of jobs created; \$20B investment pipeline





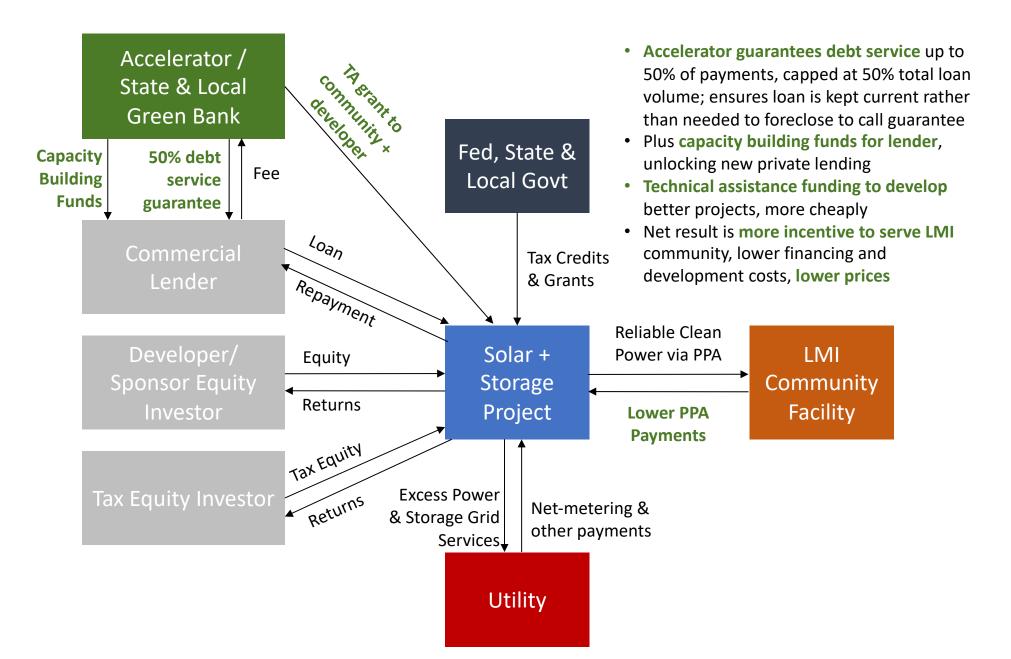
Example: Seed Loan Loss Reserve Fund to expand utility-based finance



Solution: Accelerator creates a no-cost loan loss reserve fund to mitigate risk of tariffed on-bill losses

- Accelerator offers utilities participating in tariffed on-bill programs access to a no-cost loan loss reserve fund
- Loan loss reserve fund pays out up to 0.1% of losses in tariffed on bill program
- By providing the loan loss reserve fund, the NCB encourages more utilities to invest in tariffed on bill programs instead of investing in distribution assets or increasing electricity sales
- Increased utility participation in tariffed on bill programs increases consumer access to cost-effective home clean energy upgrades

Example: TA funding + 50% loan guarantee for solar + storage at LMI community facilities



Lessons learned – public/ratepayer capital must be flexible AND it must be someone's job to achieve penetration (esp. LMI) – this is not Field of Dreams

Broad Market & Technology Lessons

- Private capital wants to invest in this space, but somebody else has to do the hard work
- Capital alone achieves little penetration requires MASSIVE growth of new businesses and jobs
- Barriers go beyond financing have to think holistically, not just about a finance mechanism
- Different solutions for different markets LMI resi electrification likely needs OBR; commercial heavy duty trucking EV fleet conversion may need ESA-based lease structure. No silver bullet.

LMI-Market-Specific Lessons

- Risk perception v. reality is genuine barrier, good place for public or utility funds. But cannot just leave it up to private capital to show up and take advantage of an LLR or reserve fund.
- Making something "available" to a customer does not count as success, only uptake



What we have learned from administering the CHEEF

Clean Energy Financing Workshop, January 2021

Miriam Joffe-Block, Senior Manager, CA Hub for Energy Efficiency Financing







California Hub for Energy Efficiency Financing (CHEEF, or the Hub)

CAEATFA, a rulemaking agency in the **State Treasurer's Office**, administers the CHEEF on behalf of the CPUC.

- Key elements:
 - Authorized to pilot energy efficiency financing programs in the **residential**, **small business**, **and affordable multifamily** sectors
 - Goals include testing whether financing alone can yield **similar or greater savings** than traditional rebate or incentive programs
 - Programs utilize a credit enhancement to leverage private capital for customer energy efficiency investments
 - Unsecured or equipment secured loans, leases or energy service agreements
 - Open market transactions program: range of lenders and contractors connect with customers on projects; the CHEEF is not involved in the financial transaction



A credit enhancement can successfully leverage private capital

For the Residential Energy Efficiency Loan (**REEL**) Program:



Lenders receive a loan loss reserve contribution for each enrolled loan:

- 11% for a loan to a non-underserved borrower
- 20% for a loan to
 - LMI Borrowers (by household income or property census tract)
 - Borrowers with credit scores <640
- Loss reserve contribution is paid back to program when loan is paid off

The Small Business Financing Program has used \$117k in credit enhancement to leverage \$1.5MM in lending

A credit enhancement can produce measureable benefits for customers

What has worked

For lenders participating in the Residential Energy Efficiency Loan (**REEL**) Program, a credit enhancement has facilitated:

Borrowing limits raised from \$20k to \$50k



Interest rates lowered 1000 basis points **Credit score minimum** lowered from 640 to 580



No fees, no property liens, no prepayment penalties

Borrower with a credit score of 580 can get a 5, 10 or 15 year loan at 3.99%, 4.99% or 5.99%



A wider pool of borrowers gets access to larger amounts of capital and longer terms at lower interest rates

Measureable benefits include interest savings

What has worked

Average interest rate of a **REEL loan**, across all terms, November 2021:

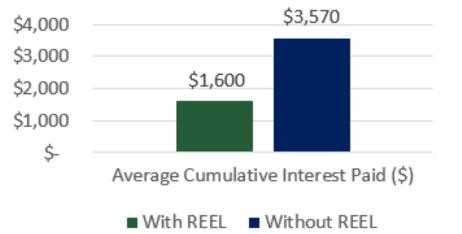
Average credit union interest rate for an unsecured personal loan, likely up to 60 months, November 2021*:

10.4%

5.02%

Cumulative Average Interest Paid

for terms up to 60 months



* <u>www.cuna.org</u>, monthly credit union estimates, page 6.

Chart compares interest rates between REEL loans and the equivalent non-REEL signature loan products offered by the Program's participating lenders, using a data set for loans with terms up to 60 months for borrowers who would have qualified for non-REEL loans. Includes data from program inception through 12/31/20.

- ✓ Finance companies want access to the California market
- Customers will make energy efficiency investments without rebates or incentives
 86% of REEL projects are "finance only" with no rebate or incentive applied (92% in Dec. 2020)
- ✓ Contractors and utilities are effective referral sources to financing
- ✓ A loan program can reach some portion of the underserved market... But only those with the cash flow to repay loans

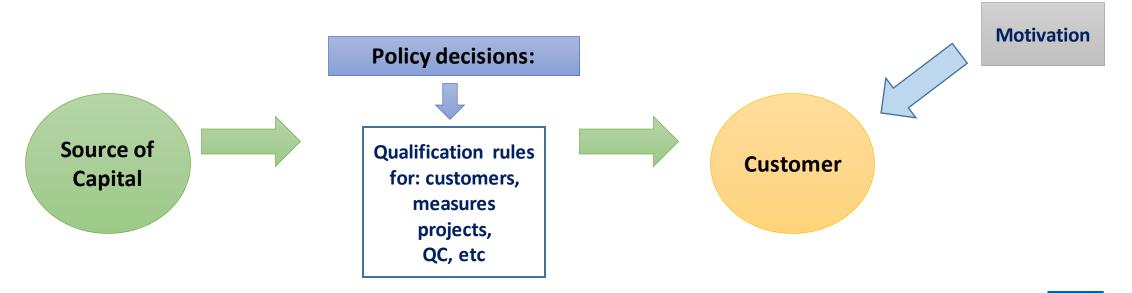




Private capital providers want to invest \$, not understand program requirements

What hasn't worked

- Lenders and investors need to be freed up from project scoping, eligibility screening, and data collection
 - Lenders' expertise is evaluating and pricing for credit risk, funding and servicing
 - This is a real challenge with our "front end" transaction model in which private lenders originate deals directly



Program complexity & uncertainty

What hasn't worked

- Geographic complexity: Lenders, customers and even most contractors do not view the world through the lens of IOU vs. POU jurisdictions
- Project silos: Customers and contractors don't look at EE and other energy measures (solar, storage, etc.) measures
- Lenders like certainty, not "pilot" programs





Sacramento: PG&E Service Heat pumps encouraged

Financing alone does not constitute a "Program"

Remaining barriers & instruments to resolve them

✓ Link financing to "Programs," delivery mechanisms, and good operations

- \circ Financing removes the upfront investment barrier, but doesn't create demand
- $\,\circ\,$ Delivery mechanism and operations can be a challenge on par with customer credit

✓ Dedicated intermediary needed between source of capital and the project

 "These loans scare the heck out of me" – quote from a REEL lender that wants to be in the EE space, but has to sort through too many eligibility requirements
 Single originator model, dedicated program staff for eligibility screens or IT solutions

✓ Make financing available truly statewide

- Figure out how to combine ratepayer and non-ratepayer sources of credit enhancement
- $\,\circ\,$ Uniform eligibility and access across IOU and POU jurisdictions
- o Ease and simplicity for lenders and contractors will lead to more projects in IOU territory



Miriam Joffe-Block

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treasurer.ca.gov/caeatfa/cheef

GoGreenFinancing.com



CALIFORNIA HUB FOR ENERGY EFFICIENCY FINANCING



We'll return at 10:45



California Public Utilities Commission

Workshop Logistics and Housekeeping

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Panel 2 – 10:45 – Noon

- Moderator: Dan Adler, Go-Biz/IBank
- Cisco DeVries, Ohm Connect
- Carmelita Miller Greenlining Institute
- Kerry O'Neill, Inclusive Prosperity Capital

CPUC Clean Energy Finance Workshop

Cisco DeVries, OhmConnect @ciscodv

January 28, 2021



People hate finance.

- Finance does not *generate* demand. It only *enables* demand.
- People generally feel that finance is a reason <u>not</u> to do something.

We Know How to Access Large Scale Capital



0



Property secured lending

markets. Credit score dependent.

Unsecured Lending

Home equity and PACE are proven successful. PACE is now a well-known asset class in the ABS market. Success with low/mod income.

Easy to access, fast, and well integrated into capital

Utility secured lending

On-bill financing has mixed record, but can great for low-income and renters. The Hawaii GEMs model has useful approach to capital markets.

Five Ground Rules for Attracting Large-Scale Capital

Do not make the perfect the enemy of the good. Think big. And put the consumer and contractor first.



- Don't Reinvent. Use an existing finance mechanism and adjust it as little as necessary to achieve the policy outcome.
- Make it Big. Attracting large scale capital requires large scale volume.
 Be as inclusive as possible in eligibility and access.
- Make it Simple. If it isn't easy to use, customers and contractors won't use it. Making it "cheaper" isn't as important as simplicity and ease of use.
- 4. **Make it Safe.** Home improvement is a messy industry. How can we make projects safer without requiring finance entities to be home contractor police?
- 5. Hide the Spinach in the Smoothie. People do not want to buy "efficiency." How do we use finance to bring efficiency and demand flexibility into something people already want?

Deeper Dive: A Couple Ideas on How to Improve "Safety"

Home improvement is one of the least trusted, most complained about service. How do we build trust?



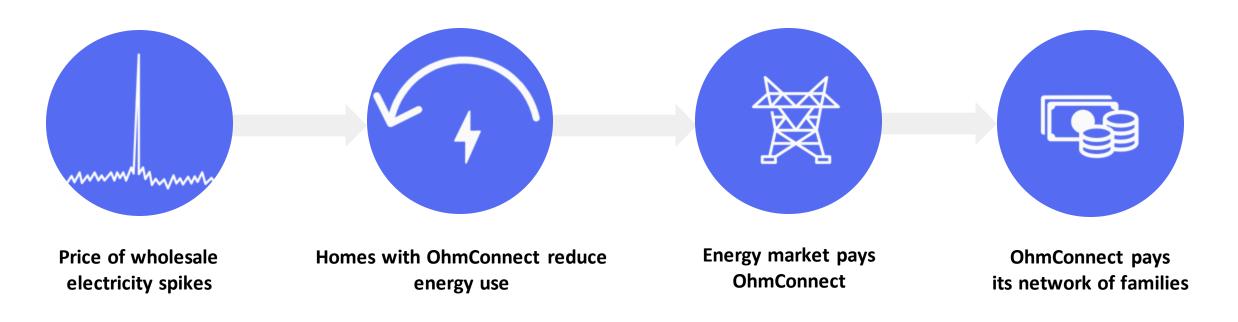
- U.S. DOE Home Energy Score can be done by the contractor in less than an hour.
- While inaccurate, it provides a basis for determining the benefit of an improvement.



- Provide financial benefits based on actual energy benefit.
- Contractor and homeowner may financially share in performance risk

Creative Option: Reduce cost, improve finance terms with grid

150,000 California customers now provide over 100 MW to the grid. Over \$4M paid to CA families in 2020.



→ You can help "finance" energy improvements and appliances by imbedding the future value of grid services in the upfront cost of financing structure

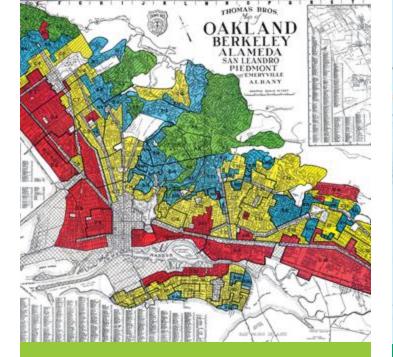
Powering Resilient Communities

CPUC Workshop on Clean Energy Finance

Carmelita Miller The Greenlining Institute Energy Equity Director

Energy Equity Principles

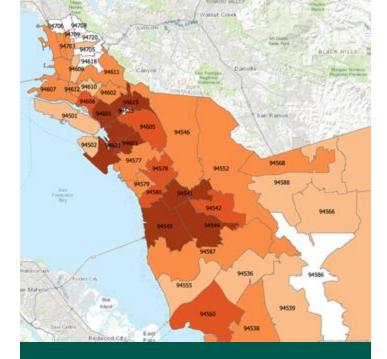
- Affordable access to clean power
- Healthier, safer, and thriving in our homes and neighborhoods
- Actively engaged in the energy decisions that impact our lives
- Attain **wealth-building opportunities** in a green economy



Oakland Redlining Map

1937

2018 Cal EnviroScreen



April 23, 2020 Oakland COVID-19 Map

COMMUNITIES HAVE ENDURED DECADES OF ECONOMIC EXCLUSION BASED ON RACE

Percentage of California's Renter Households Experiencing Rent Burden by Income

Extremely Low-Income or Below Poverty Line		Very Low-Income		Low-Income	
1.41M	total renter households	0.82M	total renter households	1.13M	total renter households
90.2%	rent burdened	85.4%	rent burdened	64.6%	rent burdened
76.9 %	severely rent burdened	47.4%	severely rent burdened	16.9%	severely rent burdened
Subtotal: All Lower-Income Renter Households (80% AMI and below)					
3.36M	total renter households	80.4 %	rent burdened	49.5 %	severely rent burdened
Moderate-Income		Above Moderate-Income		Total: All Renter Households	
0.59M	total renter households	2.03M	total renter households	5.97M	total renter households
41.5%	rent burdened	12%	rent burdened	53.4%	rent burdened
5.3 %	severely rent burdened	0.9%	severely rent burdened	28.7%	severely rent burdened

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Source: 2017 National Low-Income Housing Coalition tabulations of 2015 American Community Survey Public Use Microdata Sample (PUMS) housing file. From: California Housing and Community Development "California's Housing Future: Challenges and Opportunities"

Equitable Electrification Framework



CPUC must prioritize financial inclusion in order to achieve a just and equitable transition.



Thank You!

carmelitam@greenlining.org

THEGREENLININGINSTITUTE

@GREENLINING





CLIMATE FINANCE FOR CLIMATE JUSTICE: GREEN BANKS STRATEGIES AT WORK FOR UNDERSERVED MARKETS & DISADVANTAGED COMMUNITIES

CPUC CLEAN ENERGY FINANCING WORKSHOP FOR R.20-08-22: WHAT SUCCESS MIGHT LOOK LIKE JANUARY 28, 2021



The "Why"



We believe everyone should have access to the benefits of clean energy:

- > A cleaner, more resilient environment in the face of climate change
- > Healthier communities & buildings that create positive social outcomes
- Sustainable economic development: reduced energy burdens, increased savings, job creation, and enhanced community productivity

We can change the conversation in underinvested neighborhoods and underserved markets, helping to deliver <u>Inclusive Prosperity</u>.













Green Bank Strategies "Work" for Underserved Markets!

It <u>can</u> be done, but it's not one size fits all – need to bring a range of financing tools:

> Subordinated debt, co-investment, concessionary debt, bridge/incentive financing, warehousing/aggregation, loan loss reserves, interest rate buydowns, etc.

Have to be grounded in market data (housing/property info, income, energy burden, etc.)

> Need to tailor the solution to the market segment

Must leverage partnerships

And financing alone doesn't move the needle – need \$'s for technical assistance, programmatic support, marketing and outreach

Some organization has to "own" the deployment targets and <u>aim high</u>!

> This doesn't happen on its own – and have to have a long-term commitment – these are HARD markets

CT has mobilized \$480M in underserved markets... For CA, that = ~<u>\$6.25B</u>





Solar for All for Low-to-Moderate Income Homeowners



From Surviving to Thriving

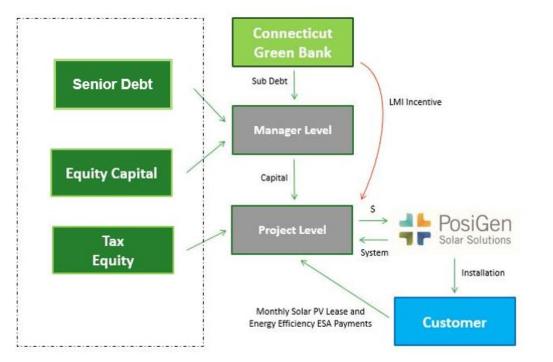


Green Bank Role in Solar for All

- Administered RFP
- Provides subordinated debt
- Provides elevated incentive
- Sponsors Solar For All
- Outreach support

IPC Role

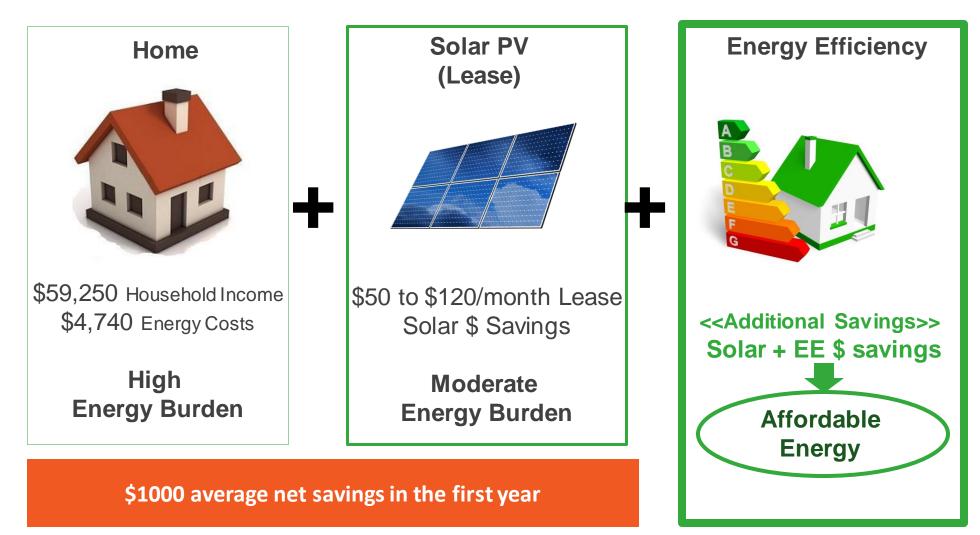
- Finance performance-based incentive
- Programmatic support to CGB for Solar for All



Solar For All with PosiGen



Lease & EE for Single Family LMI Market





Moving the Needle on Inclusive Prosperity

Equity for Rooftop Solar in Connecticut

AMI Band	# of Solar PV Projects	# Owner Occupied Households (1-4 Units)	% of Owner Occupied Households (1-4 Units) with Solar
<60%	2,759	60,769	4.5%
60-80%	4,007	99,220	4.0%
80-100%	5,931	165,331	3.6%
100-120%	6,934	187,463	3.7%
>120%	11,347	345,311	3.3%
Total	30,978	858,094	3.6%

	# Owner Occupied Households (1-4 units)	% Owner Occupied Households (1-4 units)	% of RSIP Installations
Majority Hispanic	31,152	3.6%	4.1%
Majority Black	18,163	2.1%	3.8%
Majority White	731,901	85.3%	81.8%
No Majority Race	76,878	9.0%	10.3%
Total	858,094	100.0%	100.0%

Households that were previously underrepresented in solar adoption responded favorably to market focus. CT residential rooftop solar is now "beyond parity" in LMI and communities of color

Connecticut Green Bank case study available here: ctgreenbank.com/sharing-solar-benefits-in-communities-of-color/

Multifamily Affordable Housing: Identified Gaps & Leveraged Partnerships

High level strategy:

- Worked within the housing ecosystem to identify strengths and gaps
- Developed a product roadmap based on gaps (\$\$, capacity)
- Partnered to deliver starting with State HFA pilots in 2014, key nonprofits
- Key partners have been CHFA, Dept. of Housing, CDFIs, CT Housing Coalition (nonprofit trade association)
- Focused on a social justice mission serving the LMI sector
- Note: still unserved sectors (e.g., small rentals/2-4's)

PRE-DEVELOPMENT

 Navigator – below market rate loans using foundation PRI and CDFI partner

TERM

- Lightly secured loan in partnership w/ CDFI, providing LLR and low cost debt
- **CPACE** providing debt, aggregation
- **Solar PPA** providing debt, aggregation
- Health & Safety Loan providing below market rate loan using state \$'s

M&V

- **Benchmarking** co-sponsored w/ CHFA
- **Performance Reports** built into loans

CAPACITY

- **Technical assistance** with housing consultants, UHAB
- Trainings free of charge
- **Peer-to-Peer Network** with utilities, CHFA
- Solarize Multifamily with CHFA







Case Study: Catalyst Term Loan Funding Energy Efficiency

East Meadow Condo Association, Manchester, CT

Description:	Lighting, boilers, roof replacement, insulation
Total Project Costs: Utility Incentives: Financed:	\$654,000 <u>\$34,000</u> \$620,000
Estimated Annual Savings: Annual Debt Service:	\$79,000 \$53,000, 1.48 DSCR
Estimated Free Cash Flow:	\$26,000
Financing Terms:	20 years, 6.00%
Payback Period:	7.8 years



www.ctgreenbank.com/our-stories/ - multifamily

Energy improvements yield significant savings, unlocking cash flows that cover debt service – often for additional improvements such as needed structural, health or safety work.



Accomplishments/ Impact

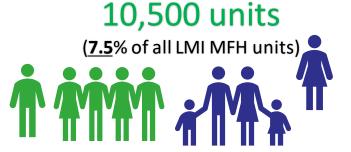
101 projects closed/completed (since FY14)

\$45,966,228 energy project costs

\$ 9,170,369 CGB investment

\$ 36,795,859 non-CGB energy investment





\$45,966,228

capital deployed for energy improvements

(=~\$600M for CA)

\$305,819,867

total investment (energy, pre-dev & other)



What Else?

Pay As You Save ®

- > Love this for low-income homeowners and renters of all incomes!
- > LLR and subordinated debt or co-investment (for utilities that need a 3rd party capital source

Loan Loss Reserves to mobilize local lenders to offer standard clean energy loan to homeowners

- > Aim high! CT, MI and CO have originated >\$250M and 23,000 loan with 16 active lenders, 1000+ contractors. All 3 states offer programmatic support to lenders and contractors. Some have IRBs too.
- > MI is >50% LMI census tracts, FICO down to 600 (CT down to 580)
- > CA is a bigger market than CT, MI, CO combined can REEL be vastly scaled?



What Else?

Partnerships with Housing Developers

- > Portfolio owners help them green or solarize their portfolio
 - Take a standard loan product and tailor to their specific needs (e.g., if debt terms look a certain way, they can apply across their portfolio)

> Virtual power plant models

Subordinated debt or co-investment, particularly to support LMI communities/developments

"Second Look" or credit-challenged products

- > For big solar/efficiency financiers
- > Their capital providers don't like lower credits enable credit-challenged or alternative underwriting approaches through LLRs, subordinated debt, tailored structures



What Else?

Proof of Concept with Specialized Models

> IPC did this with BlocPower

We were the first credit facility for their heat pump leasing model aimed at affordable MF, nonprofits and small/medium commercial in the urban core. Intention is to "graduate" to bigger private capital facility.

Finance the "friction points" in the market

- > Bridge financing for incentives (utility, RECs) is a big one, especially for smaller/minority contractors with fewer options/access to working capital
- > Big issue in getting contractors back to work coming out of pandemic



Strong state agency buy-in and stakeholder capacity in energy, housing and health sectors are the foundation of a statewide collaboration







Ingredients for Success

- > Partnerships are needed to leverage resources and provide comprehensive solutions
- > Programs should fill gaps in the market and be developed with a data-driven approach
- > 100% financing that reduces energy burdens is ideal but there are some markets that just need access to financing
- > Targeted outreach and focused efforts amplify results
- > Barriers to program participation should be reduced as much as possible don't assume just because uptake is low that your product is the problem... it could be execution (see above on partnerships + targeted outreach, also look at contractors/are they serving target markets?)
- > Universal program metrics engender transparency and accountability measure progress, identify what works, what doesn't and where the gaps are
- Consumer protections and education are a must, especially with LMI, and even more <u>especially</u> <u>with LMI seniors</u> (public \$'s at play give you control here)
- > No one size fits all, need a range of financing tools across all market segments
- > Need to have a long horizon, analyze your market, sequence strategies, and invest for long term
- > Aim high and make sure some organization owns deployment targets





You must be INTENTIONAL

about EQUITY



CONTACT INFORMATION:

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We'll be Back at 1 PM



California Public Utilities Commission

Workshop Logistics and Housekeeping

- Panels are 75 minutes 1 hour presentation, 15-minute panel Q&A
- Public Comment at the end of each day 15-minute moderator lightning round followed by 45-minute Public Comment
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Panel 3 – 1:00 to 2:15

- Moderator: Jeff Deason, LBNL
- Amber Mahone, E3
- Mike Henchen, Rocky Mountain Institute
- Matthew Brown, National Energy Improvement Fund



ELECTRICITY MARKETS & POLICY

Getting to scale: Magnitudes of investment needed

Clean Energy Financing Workshop California Public Utilities Commission R.20-08-022 January 28, 2021



- □ What scale of investment is necessary to meet California's clean energy goals?
- □ What are the priority technologies that will require investment?
- How might we expect these priority technologies and needs to evolve over time?
- □ How do those investment needs look from the customer's perspective?
- What have we learned from past efforts about how the impact of financing investment dollars in clean energy can be maximized, so that these investments deliver the scale we need?
- To what extent will these lessons obtain to future technologies (e.g., storage, electrification), and to what extent might things need to be different?



□ Amber Mahone, Partner, Energy and Environmental Economics, Inc.

□ Mike Henchen, Principal, Rocky Mountain Institute

Description Matthew Brown, Co-Chair and Founder, National Energy Improvement Fund





Financing California's Residential Building Decarbonization Goals

CPUC Clean Energy Financing Workshop, R.20-08-022

01/28/2021

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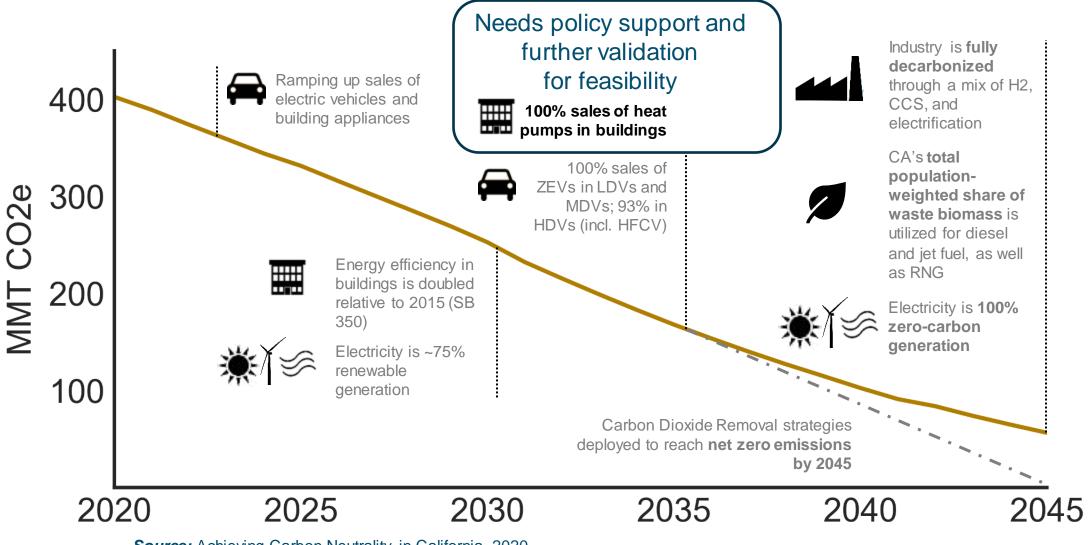
Amber Mahone



- + Achieving carbon neutrality in California
- + Climate change & impacts on buildings
- + Lifecycle costs/savings from residential electrification today
- + Decomposing electrification retrofit costs
- + Rough cut: Statewide residential capital costs for building electrification
- + Concluding thoughts



What might it take to achieve carbon neutrality in California by 2045?



Source: Achieving Carbon Neutrality in California, 2020 https://ww2.arb.ca.gov/sites/default/files/2020-10/e3_cn_final_report_oct2020_0.pdf



Four Key Strategies to Decarbonize Buildings



Energy efficiency & conservation

- Whole-home high efficiency retrofits & new construction codes
- Electric heat pumps \checkmark displacing resistance heat
- Smart-growth: higher \checkmark density housing in transit-oriented communities





Electrification

- Heat pump HVAC
- Heat pump water \checkmark heater
- Induction stoves \checkmark
- ✓ Electric clothes dryers
- ✓ Electric fireplaces, grills, space heaters, etc.



Low-Carbon Fuels

- Zero-carbon \checkmark electricity
- Zero-carbon biomethane
- Potentially, small \checkmark share of renewably produced hydrogen blended into gas pipeline

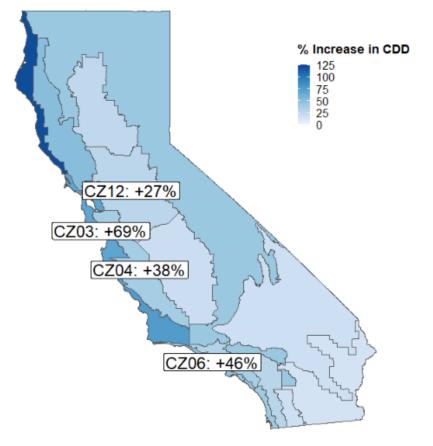


Reduce non-combustion emissions

- Prevent methane leaks in homes and gas pipeline
- ✓ Replacement of high global warming potential gases ("Fgases") in air conditioners and heat pumps



Projected Increase in Cooling Degree Days (CDD) by 2050

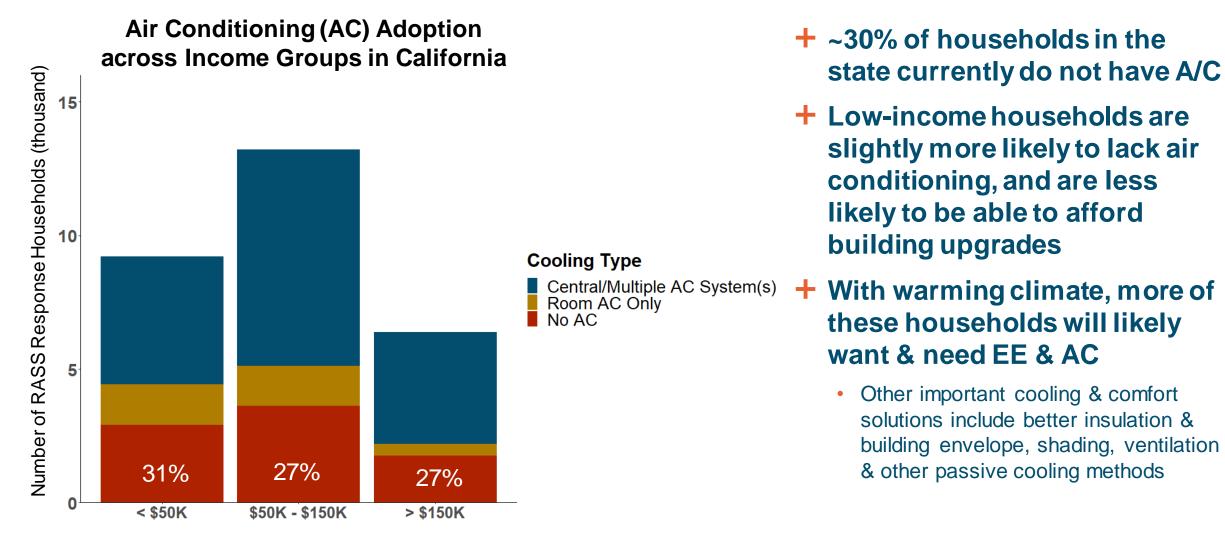


- + A warming climate will increase the need for air conditioning (AC) in buildings, particularly in regions of the state that historically have not needed AC
 - Heating needs in buildings will also decrease
- Heat pumps provide both heating and cooling, and are most cost-effective in homes that have or need AC
- COVID and wildfire smoke are also causing building owners to re-think ventilation and air filtration standards, which may create additional needs & opportunities for building retrofits

Source: Cal-Adapt data portal, average annual increase in cooling degree days in RCP 8.5, averaging across all 32 climate models in Cal-Adapt.



Can we find opportunities to address equity and comfort in buildings, while reducing carbon emissions?



Source: California Residential Appliance Saturation Survey, 2019



Lifecycle savings currently most attractive for Res. electric new construction and heat pump HVAC

Single Family **Entire home** All-electric (new construction w/ AC in baseline) All-electric (new construction, no AC in baseline, CZ3) HVAC Mini-split(retrofit) Ducted heat pump (retrofit) Ducted heat pump (new construction w/ AC in baseline) Ducted heat pump (new construction, no AC in baseline, CZ3 Water heater Heat pump water heater vs. gas storage (retrofit) Heat pump water heater vs. tankless gas (new construction) Range/Oven Electric induction **Clothes dryer** Heat pump dryer . \$400 ._{\$800} 0_{ęž}

Lifecycle costs Lifecycle savings over lifetime of equipment

5400 5800

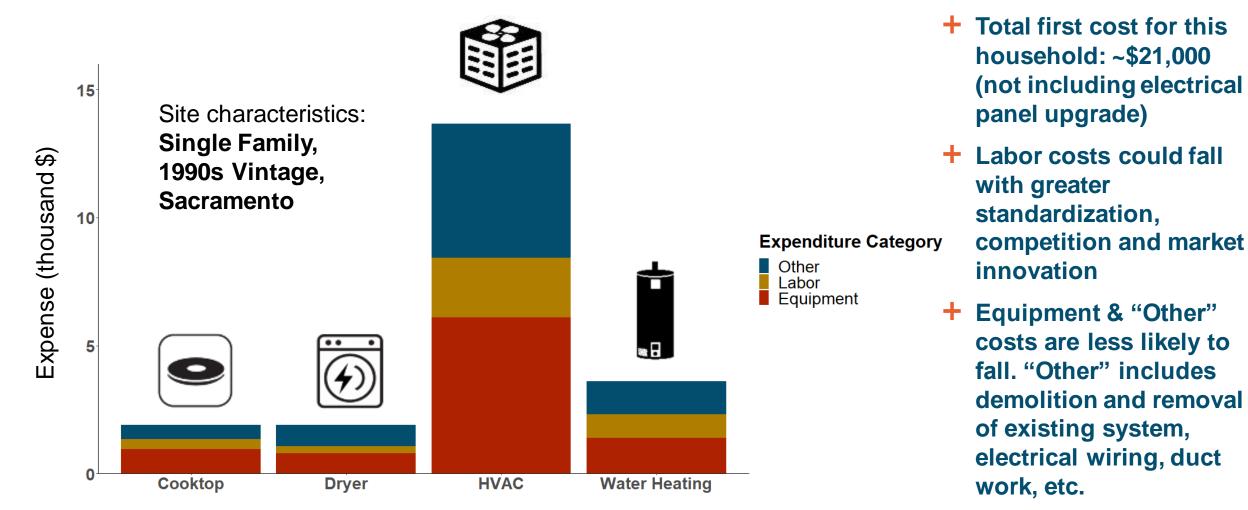
- Customer lifecycle savings requires that incremental capital costs can be offset by bill savings over time (assumes 3.35% after-tax real discount rate) – this option is currently not available to renters (landlord/tenant split) nor many households
- Costs shown are for electrification in single family homes, relative to a gas baseline.
- Cost ranges reflect variation in climate zone and utility rates.

Source: E3 Residential Building Electrification in California, 2019 https://www.ethree.com/wp-content/uploads/2019/04/E3_Residential_Building_Electrification_in_California_April_2019.pdf

Energy+Environmental Economics



Will capital costs decline over time?



Source: E3 Residential Building Electrification in California, 2019 https://www.ethree.com/wp-content/uploads/2019/04/E3_Residential_Building_Electrification_in_California_April_2019.pdf

Energy+Environmental Economics

What could it cost to retrofit single family & low-rise residential homes to all-electric by 2050?

Home Type Number of Approximate Approximate Number of Housing Units (million) Single Family Upfront **Total Cost for Multifamily** Retrofit Housing Retrofit **Housing Stock Retrofits/Year** Units by Cost/ 2050 Household (through 2050) (\$2018) (\$2018) Single Family 8.7 M \$28 K \$8 Billion/vr Fuel Type Electric New Construction Existing Electric Low-rise 3.3 M \$18K \$2 Billion/yr Existing Fossil **Multifamily** Retrofitted Fossil 8.7M **Estimated** 12 M ~\$10 Billion/yr Combined 3.3M Total * For HVAC, water heating, cooking & clothes drying. Not 0 electric vehicle, rooftop solar, or storage. Not including high-rise 2050 2020 2020 2050

Rough Estimate of Capital Cost Needs*

Sources: Households from CA Department of Finance housing estimates, "E-5 Population and Housing Estimates for Cities, Counties, and the State, 2011-2020 with 2010 Census Benchmark". Current fuel mix proportions from California Residential Appliance Saturation Survey, 2019. Retrofit costs from E3 Residential Building

Energy+Environmental Economics

Electrification in California, 2019



- + Greenhouse gas emissions from buildings must be nearly eliminated, in less than two decades, to achieve our climate goals
- + Given the slow turn-over of the building stock and building equipment, the pace of change and scale of this transformation is unprecedented
- + A warming climate, wildfires, and COVID create added urgency to make our buildings more resilient, sustainable and healthy
- Incentives, codes and standards, and higher prices on fossil gas (carbon price or decarbonized gas) are needed to motivate the market, but will not be sufficient on their own to transform the state's building stock
- + Financing is an important piece of this puzzle; works best when paired with bill savings
 - On-bill financing solutions appear promising for renters
 - Key uncertainty includes long-term trajectories for natural gas and electricity rates
- + Combine energy efficiency with electrification, EV-ready charging, and potentially solar + storage for best effect

Clean Energy Financing in Buildings

Financing Workshop for R.20-08-022

THIN 1

January 2021



Transforming global energy use to create a clean, prosperous, and secure low-carbon future.

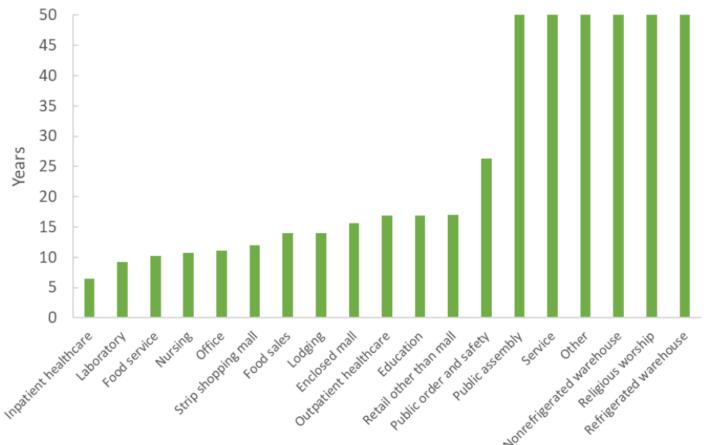
In the residential sector, investment needs vary widely based technology bundle

Source	Bundle	Investment per household, \$
RMI	 Heating, cooling, water heating, cooking (single family new construction) 	← 11-19k
	 Single family whole home electrification retrofit 	← 12-24k
E3	 Single family heat pump retrofit 	← → 13-20k
Rewiring America	 Comprehensive: EV, solar, battery, heat, water heating, cooking (BAU) 	60k
	 Comprehensive: EV, solar, battery, heat, WH, cooking ("Good" cost reductions) 	21k
0		10 10

3

Commercial building electrification economics vary widely by building type...

Median simple payback by commercial building type: replace gas packaged system with rooftop heat pump Years

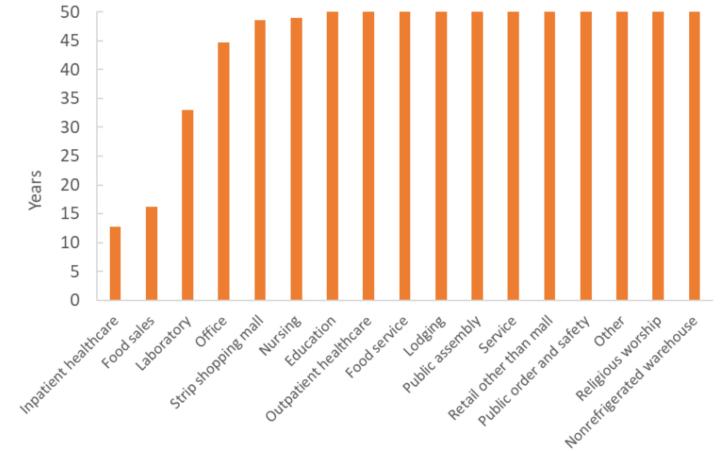




Source: Electrifying Space Heating in Existing Commercial Buildings, ACEEE 2020

...with some system configurations more challenging to pay back

Median simple payback by commercial building type: replace **boiler with ductless or VRF heat pump**



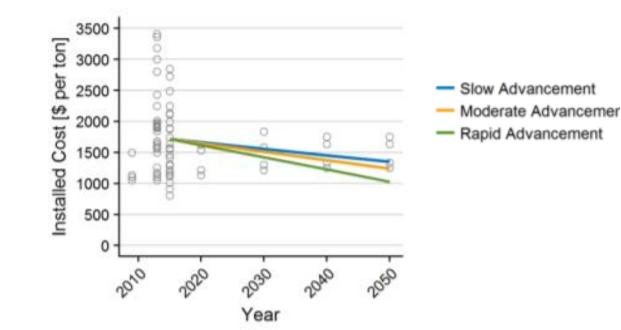


Source: Electrifying Space Heating in Existing Commercial Buildings, ACEEE 2020

Building decarbonization costs are likely to fall - ASHP

- Soft costs are large component of heat pump installed costs, with significant variation
 - Low installer, customer familiarity
 - Uncertainty as a price premium
- Local product availability and supply chain may present opportunities
- Should be paired with rate reform, business model innovation to drive adoption

Figure 21. Installed unit costs (left) for residential ASHPs



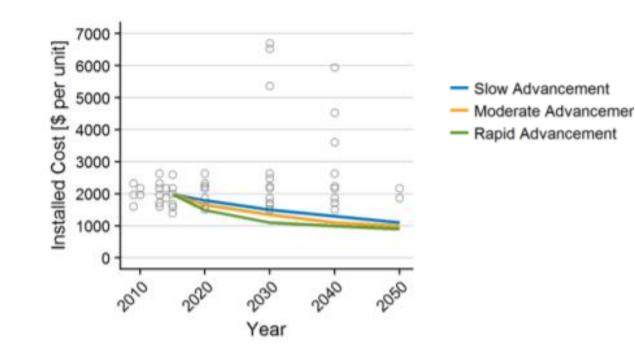
*NREL Electrification Futures Study



Building decarbonization costs are likely to fall - HPWH

- Soft costs are large component of heat pump installed costs, with significant variation
 - Low installer, customer familiarity
 - Uncertainty as a price premium
- Local product availability and supply chain is still emerging
- Should be paired with rate reform, business model innovation to drive adoption

Figure 21. Installed unit costs (left) for residential HPWHs



*NREL Electrification Futures Study



Some strategies that make electrification more affordable require more up-front investment and financing

Net present cost of solar plus electrification compared with gas Oakland default TOU scenario, thousand \$

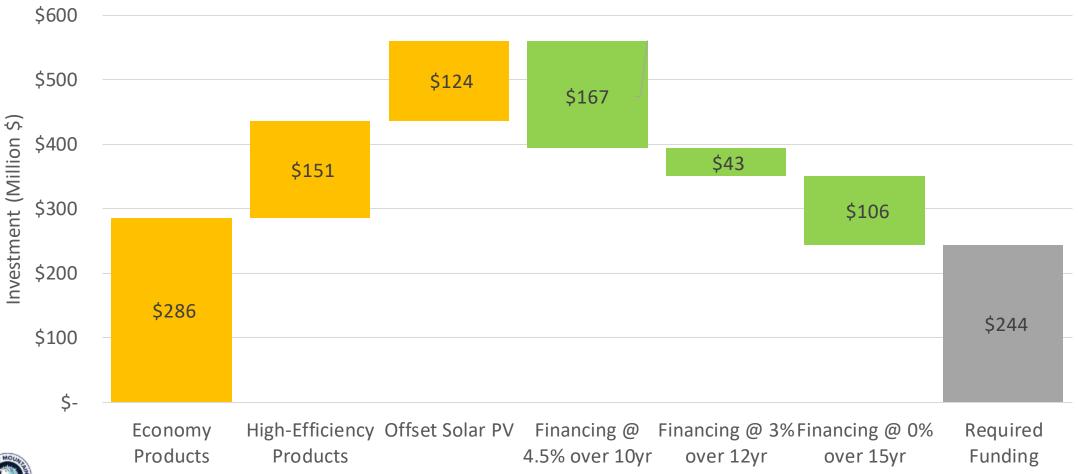


Because solar is already cost-effective vs. grid power in Oakland, in part due to inclining block rates, electrification with solar is more advantageous than with grid power



Aggressive financing terms make the transition manageable, even in the Bay

Up Front Cost to Electrify Berkeley's 42,000 Low-Rise Homes (\$Mil)



⊥∠yr

So, what to look for in "best bets" for financing building decarbonization solutions?

Strongest payback

- Favorable building configurations
- Propane heating
- New construction

Bigger bundles

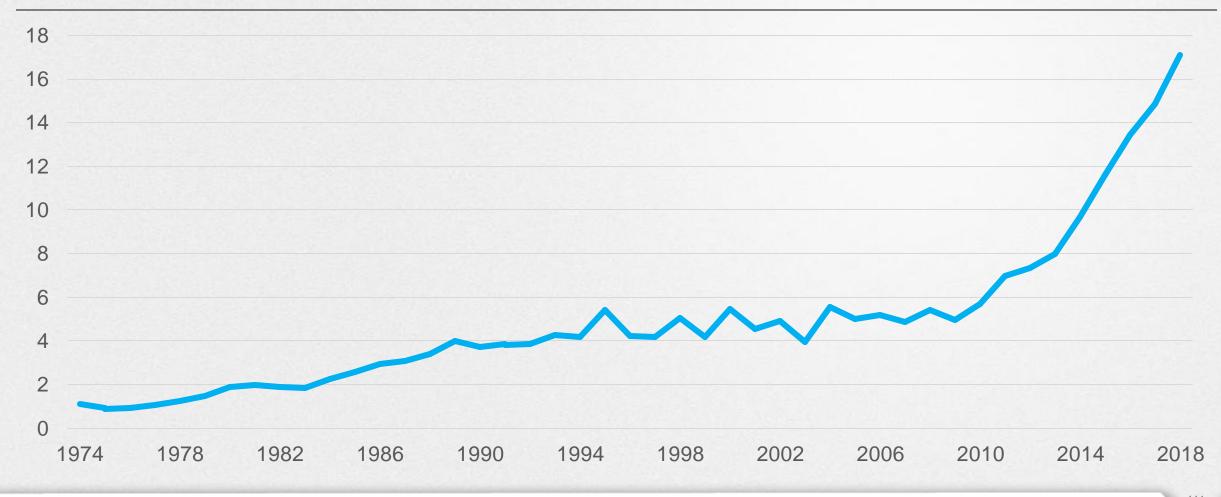
- Add solar or EE to bring down operating costs
- Bundle with EV
- Compensation to monetize DR, storage
- Updated electrification rate designs



Gas distribution system spending has tripled since 2010

US gas distribution system construction expenditures

\$ billion, 1974–2018



Thank you!

AL. W

Mike Henchen mhenchen@rmi.org



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Financing the Transition to a Resilient and Energy Efficient Economy

Presentation for CPUC Financing Workshop



This company meets the highest standards of social and environmental impact



Corporation



Provides commercial and consumer **financing for essential energy and resilience improvements** like HVAC, roofing, lighting, solar and battery storage.

Supervised as a **consumer lender** and servicer in 20 states including California and operates its **commercial financing** platform nationally.

Delivered through **partnerships** with associations, contractors, distributors, manufacturers, utilities and governments.

With experience dating to 1947 (AFC First), NEIF is a **for-profit Certified B Corporation**[®].





Echoing What You've Heard Already...

- The required investments will be massive.
 - Single family residential units in California number over 7,000,000.
 - If heat pumps and other measures cost \$20,000 (a conservative number...)
 - Total investment in the single family residential sector alone is \$140,000,000,000.
 - Total investment for the public and commercial sectors are unknown. But the number is very large.
- In 2011, we did a study for the CPUC as part of the CPUC's previous finance investigation. This study is available at:

https://docs.cpuc.ca.gov/efile/rulings/157049.pdf





Major conclusions from 2011

- We would expect over \$20,000,000,000 required to meet the goals at the time (generally around 20-25% reduction in energy use), not accounting for climate goals, electrification etc.
- At the time, utilities had plans to spend about \$500 Million on efficiency programs from 2010-2012, resulting in perhaps \$1.5 Billion in investments.
- Bottom line: Utility investments at the time were not even close to what would have been required to meet just energy efficiency goals.
 - Financing with private capital was (and is) essential





Now, with a decade of experience at a (still) small scale.

• Utility-run/funded on-bill programs.

- Ratepayer funds serve as only capital source.
 - Provides capital that can be lent at very low cost and able to take flexible credit risk.
 - Typically subject to all regulatory requirements of any ratepayer funds AND significantly limited amounts of funds – in the \$millions instead of the \$billions.
 - Restrictions on timing of payment (only after project is completed) and on measures funded make have hampered OBF growth.

• Utility supported private programs.

- Private capital is primary source of funds, but ratepayer funds provide credit or other supports.
 - Provides capital where treatment of credit risk can be more flexible than solely use of private capital.
 - Typically subject to regulatory oversight as with above. Amount of funds available remains limited, although is greater due to leveraging of ratepayer funds.





- Uptake has been modest
 - Constraints have been:
 - Limited capital available for some programs
 - Inflexibility in use of ratepayer funds has limited market size and uptake
 - Inability to use funds for solar, for water conservation, for non-energy measures, for fuelswitching has limited total market size
- Tremendous effort to set up programs
 - The time required to establish CAEATFA programs, with coordination amount 4 IOUs, the CPUC, CAEATFA and multiple intervenor parties has been substantial.





Thoughts on new and larger roll-out of CPUC-authorized programs

- Provide maximum flexibility possible: simplicity and flexibility are critical
 - Measure and measure combinations
 - Overall cost allocations among different measures (eg. Provide ability to structure different programs and sub-programs flexibly).
 - Limit number of parties involved in design, and, if possible have CPUC provide clear guidance as to goals at the outset without getting involved in authorization of specific program details.
- Continue to lean towards leverage of ratepayer funds in order to attract private capital.





Think: Scale

- Scale requires attracting private capital
- Scale requires simplicity and speed
- Scale requires a step back: Balance oversight with flexibility





ELECTRICITY MARKETS & POLICY

Panel Contacts

Amber Mahone: amber@ethree.com

Mike Henchen: <u>mhenchen@rmi.org</u>

Matthew Brown: mbrown@neifund.org

Jeff Deason: jadeason@lbl.gov



Workshop Logistics and Housekeeping

- Panels are 75 minutes 1 hour presentation, 15-minute panel Q&A
- Public Comment at the end of each day 15-minute moderator lightning round followed by 45-minute Public Comment
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Panel 4 – 2:15 – 3:30

- Moderator: Anthony Kinslow II Clean Energy Works/Gemini Energy Solutions/Stanford
- Stacey Tutt, CA Low-Income Consumer Coalition
- Ashlyn Kong, CPUC Public Advocates Office
- Kathleen Yip, CPUC Energy Division Equity Lead
- Paul Yee, CA Dept of Financial Protection & Innovation



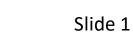
Guiding principles highlighted by this panel:

- . Equity
- . Affordability
- . Resilience
- . Effectiveness
- . Consumer protections

Moderator: Anthony Kinslow II, PhD

www.geminiesolutions.com | akinslow2@geminiesolutions.com

- Founder & CEO, Gemini Energy Solutions, LLC
- Member of CA Underserved Working Group
- Policy Consultant, Clean Energy Works
- Stanford University Lecturer
 - Racial Equity in Energy
 - Quest for an Inclusive Clean Energy Economy





100% Zero-Carbon Means Everybody

California's GHG Emissions Reductions Policy Timeline E.O. B-55-18 AB 32 SB 1383 Economywide E.O. S-3-05 Economywide 75% reduction of carbon neutrality **GHG** emissions Economywide organic waste & net negative equal to 1990 disposed in landfills GHG emissions 80% emissions thereafter levels from 2014 levels below 1990 levels SB 32 -— SB 1383 Reduce methane Economywide **GHG** emissions & HFCs 40% and black carbon 50% 40% below 1990 levels below 2013 levels 2020 2023 2025 2030 2045 2050 SB 350 **SB 100** 60% renewables Double energy for electricity efficiency SB 100 E.O. B-16-12 100% zero-carbon Transportation sector SB 1383 electricity GHG emissions 80% 50% reduction of SB 1275 E.O. B-48-18 Low Carbon Fuel below 1990 levels One million zero-E.O. B-16-12 organic waste 5 million ZEVs Standard disposed in emission vehicles 1.5 million Carbon intensity of landfills from 2014 (ZEVs) or near-ZEVs gasoline reduced *EFI calculated the LCFS reductions percentages using the ZEVs levels 16.8%, diesel 14.9%, carbon intensity levels for gasoline, diesel, and jet fuel from and jet fuel 10.1% 2011-2030 as specified in 17 CCR § 95480-95497 below 2011 levels*

To meet its aggressive GHG emissions reduction goals, California has a number of policies aimed at reducing emissions from various sectors and end uses. Note that bill numbers were used as a shorthand. Source: EFI, 2019

Pathways For Deep Decarbonization In California, Energy Futures Initiative (EFI), April 2019, Figure S-1.



There is a Coverage Gap

Millions of households are fall between being unqualified for both government funded coverage and tradition financing coverage.

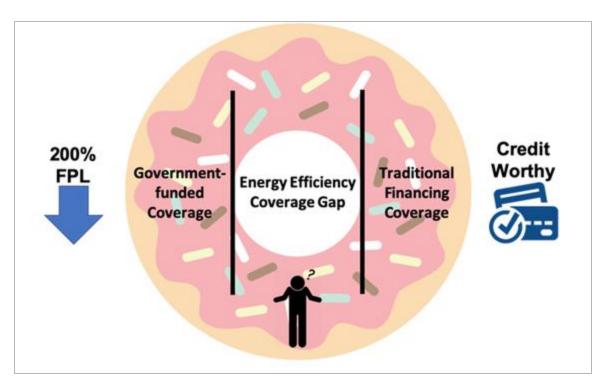


Image developed based on research published in 2020 by Prof. Tony Reames, University of Michigan





Public Awareness and Support

Black and Hispanic individuals have a measurably higher degree of concern about global warming and want more action

Source: 2018 Survey conducted by ABC News, Stanford University, and RFF. [http://www.langerresearch.com/wpcontent/uploads/1198a1Global-Warming.pdf]

	U.S. government should do great deal/a lot	Global warming is a "very" serious problem for U.S.
All	61%	51%
Democrats	84	78
Republicans	32	25
Independents	63	48
Liberals	85	77
Moderates	63	50
Conservatives	42	36
Very liberal	88	77
Very conservative	33	27
Age 18-39	70	61
50+	54	44
College graduates	65	56
Post-graduates	71	66
Non-college graduates	59	50
Whites	53	46
Nonwhites	75	62
Blacks	81	71
Hispanics	75	60
Evangelical white Protestants Non-evangelical white	40	32
Protestants	53	46
White Catholics	59	46
No religion	72	66



Opinion Dynamics

Debt-Based Solutions Do Not Scale

Residential Energy Efficiency Loan Assistance Pilot Final Impact Evaluation Report

Odunsky

CALMAC Study ID# CPU0200.01 January 2020 Key Insights: Residential Loan

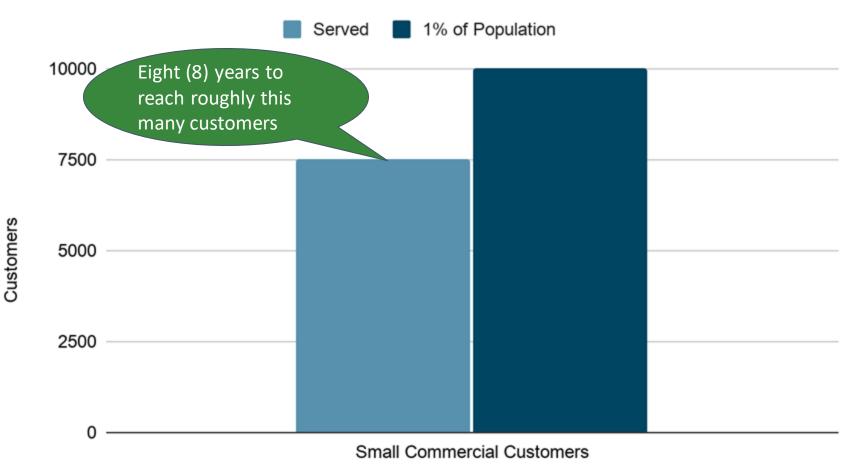
- 8+ million households in California
- Unable to reach 99.99% of customers Commercial Loan
 - Millions of businesses
 - OBF has not reach 1% after 8 years of performance



After 8 Years, OBF has reached only ~1% of Population

How are we applying principles of **affordability**, **effectiveness** and **equity**?

On-Bill Financing Loan Program







- The vast majority of ratepayers are not served by existing offers
- Millions of households neither qualify for government assistance nor traditional financing the Donut Hole
- Applying equity, affordability, resilience, effectiveness, and consumer protection principles to determine solutions will help address the Donut Hole.



- An influx of private capital is necessary to meet the scale
- Improving existing solutions is not enough



PUBLIC ADVOCATES OFFICE

Clean Energy Financing: the Ratepayer Perspective

Your Delivery charg . \$272.05 transmi . \$2,588.51 distrit . \$22.99 nuclear . \$240.17 public Franchise fees repr Your Generation ch

Ashlyn Kong Sr. Analyst, Customer Programs Public Advocates Office

CPUC Clean Energy Financing

Workshop January 28, 2021

201-300% of Baselina Over 300% of Baselina Net Charges 5351

Energy - Sommer On peak 1.993 kWh x \$0.0798 Mid peak 2.616 kWh x \$0.07981 Off peak 2.710 kWh x \$0.07981 \$21 Energy - Winter Mid peak 1.235 kWh x \$0.07981 \$98.57 Off peak 798 kWh x \$0.07981 \$63.69 Encilities related demand 360 kW x \$1.86000 \$669



2 key considerations for ratepayers





Cost-Effectiveness

Risk Management



The Voice of Consumers, Making a Difference!



Program benefits should exceed costs





Consider **existing methods** like TRC test for easier integration with and comparison to existing CPUC programs

Well-designed, cost-effective **pilots** may be an appropriate means of testing at a small scale before investing significant funds





Manage ratepayer risk, both broadly and individually

- Sustainable financing programs will require majority third party capital
 - Risk must be allocated thoughtfully between ratepayers and third parties, both downside and upside
 - Risk allocation may change over time
- Minimize cost shift from program participants to non-participants
 - Consider what, if any, benefits accrue to non-participants
- Protect individual ratepayers from excessive risk
 - Avoid disconnections



Paul Yee

Senior Counsel/Enforcement Division California Department of Financial Protection & Innovation

What is PACE? (Property Assessed Clean Energy)

- PACE is a financing option that property owners can chose to fund energy efficient home improvements to their homes, such as solar panels, water heaters, water systems, HVAC systems, doors & windows, "cool" painting and certain fire or earthquake projects.
- PACE financing results in a lien being placed on the property. It is paid back through the homeowner's property tax and thus is a "super lien" – it has priority over other liens.
- PACE is administered through Program Administrators (PA) and since January 1, 2019 are required to be licensed by the DFPI. There are presently 5 PAs.

Some Facts on PACE

- Findings from the annual report for 2019 calendar year activity (report on 2020 activity due on 3/15/21)
- ✓ Gross Income: \$62,493,387
- Total amount of assessment contracts funded: \$362,347,433
- Total number of assessment contracts made: 12,335
- ✓ Aggregated fees and other charges: \$83,337,986
- Estimated greenhouse gas emissions reductions: 277,644 kilotons
- Estimated jobs created: 3,254
- ✓ 593 consumers exercised three-day right to cancel
- ✓ DFPI received 162 PACE complaints in 2020
- ✓ DFPI expects the PAs to report that the 2020 numbers to be down from 2019

Problems Encountered

- PAs sign up contractors (who are licensed through the Contractor's State License Board) to market PACE to homeowners. The contractors are called solicitors and solicitor's agents and are registered with but not licensed by DFPI.
- The solicitor/contractor is the point of contact between the PA and the homeowner. This allows the solicitor contractor to misrepresent PACE to the homeowner and the PA denies responsibility for the solicitor's acts.
- Two types of fraud: 1) outright fraud by contractor assuming identity of homeowner; 2) misrepresentation of what PACE is.

Desist and Refrain Order Against Eco Technology – Outright Fraud

- 1. Eco Technology Desist and Refrain Order against Eco Technology to prevent them from participating in PACE.
- 2. Agents of Eco Tech promised upgrades were a "free government" program.
- 3. Contractor asked for PII, Tax returns, utility bills, income statements, etc.
- Contractor created fake emails and phone numbers and applied for PACE financing.
- 5. PACE financing is conducted primarily on an iPad or tablet with DocuSign.
- 6. The items were actually installed but grossly over-priced.
- 7. Homeowner is not aware of the lien until the next property tax bill or mortgage statement.
- 8. In Connection with the D&R Order, DFPI worked with one of the PA to obtain lean release and reimbursement for 22 homeowners defrauded.

Misrepresentation

- Solicitor/contractors misrepresent that PACE can cover the cost of building ADUs (granny units).
- Solicitor/contractors tell the homeowner to sign or simply to say "yes" when the PA calls to verify that the homeowner understands the key financing terms (in a general sense).
- Many times the project is verified to be complete, contractor paid in full but in reality the job has not broken ground yet and the contractor disappears.
- In both outright fraud and misrep cases, the homeowners are mono language speaking only or elderly or both.
- Resolution of the misrep matters are difficult and ongoing.



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SB 350 Low-Income Barriers Study, Part A -Commission Final Report

Structural Barriers Limiting Access to Clean Energy for Low-Income Customers

- Low home ownership rates
- Complex needs, ownership, and financial arrangements for low-income multifamily housing
- Insufficient access to capital
- Building age
- Remote or underserved communities

Policy and Program Barriers Limiting Access to Clean Energy for Low income Customers

- Market Delivery
- Program Integration
- Data Limitations
- Unrecognized non-energy benefits

Financial Scarcity and Financial Decision-Making

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Financial scarcity unconsciously "captures attention whether the mind's owner wishes it or not and impedes the ability to focus on anything else."

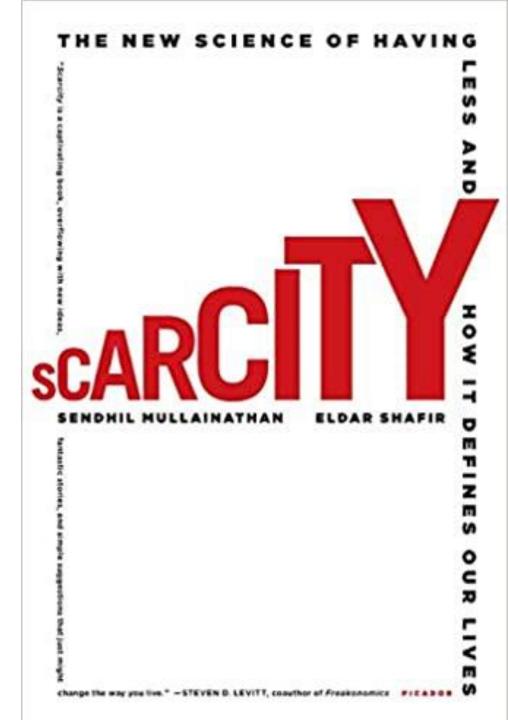


Bandwidth tax occurs when people are forced to constantly focus on an immediate crisis, which causes them to ignore other decisions.



"Tunneling," or focusing on the most immediate and pressing financial need to the exclusion of others.

Source: A. Mechele Dickerson, *Financial Scarcity and Financial Decision-Making*, 58 Ariz. L. Rev. 137 (2016)



PACE Promises

 Door to door solicitation marketing model increased access but... Fraud/Negligent Misrepresentation/Insufficient Disclosures when loans are not sold by financial specialists

More than just disclosures...

- Careful explanation, both written and verbal, is required.
- Not in financial-sector jargon.
- Materials should be available in foreign languages for homeowners for whom English is not their primary language.
- Need up-front communications
- Be realistic about how people tend to manage their budgets.

Source: Energy Programs Consortium, Assessment of Low Income Homeowner Participation in the Property Assessed Clean Energy (PACE) Program in California, November 2017

PACE Promises

- Door to door solicitation marketing model increased access but...
- Equity Based Financing increased access for those with poor credit but
- Transactions often occur at lightning speeds and are in most cases paperless but...
- Creates super-priority lien to reduce finance providers risk but...
- No energy audits or inspections required to reduce upfront costs to consumers but...

- Fraud/Negligent Misrepresentation/ Insufficient Disclosures when loans are not sold by financial specialists
- Unaffordable for asset rich/income poor consumers
- Incentives fraud and price gouging by home improvement contractors
- Did not result in less expense to homeowners, PACE interest rates are often 2-3 times higher than regular mortgage rates

The Dark Side of the Sun

How PACE Financing Has Under-Delivered Green Benefits and Harmed Low Income Homeowners



Failure to require energy audits & inspections results in:

- Inaccurate Energy Savings Estimates and Uninformed Investments
- Lack of quality control on work performed
- Encouragement of contractor fraud

Financing Energy Upgrades With Home-Secured Debt is Inappropriate for Low-Income Homeowners

- Such debt-based financing can be perilous to those with low or fixed incomes and few assets.
- Home-secured financing for low-income homeowners can be catastrophic because a missed tax payment can quickly escalate to foreclosure.
- Without guaranteed energy savings to offset or at least meaningfully mitigate PACE assessment costs, these costs put the mere 26% of low-income Californians fortunate enough to own their homes at risk of losing their most precious asset: their home equity, or even, their shelter.

Things to consider for effective program delivery

Kathleen Yip CPUC January 28, 2021



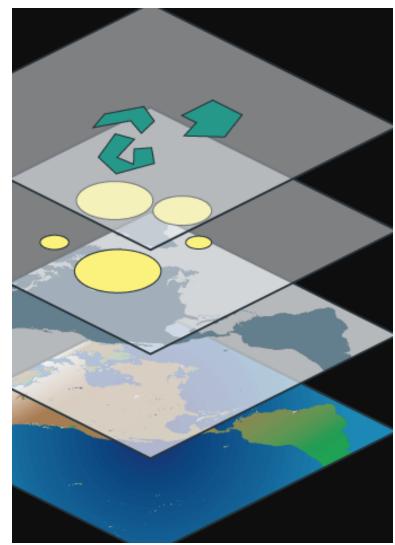
California Public Utilities Commission

BUILD TRUST.



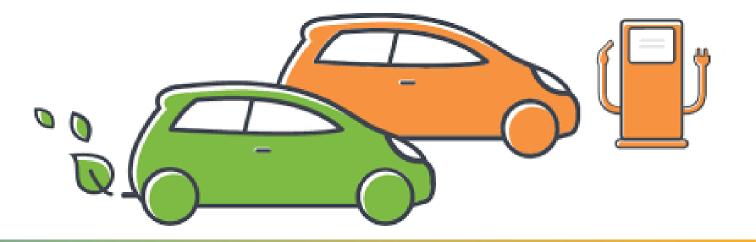
MEET PEOPLE WHERE THEY ALREADY ARE

- Partner with food banks, health care providers, public housing organizations
- Be flexible and adapt to the needs of the community (outreach, inlanguage)
- Consider how to leverage other programs that already have significant uptake
- Not just about saving money



CARB'S CLEAN VEHICLE ASSISTANCE PROGRAM

- Very hands-on program for low-income customers to get a loan for a vehicle
- Community-based organization does outreach and engagement with community members
- Financial literacy education component of the program
- Clean Vehicle Assistance Program (cleanvehiclegrants.org)



Thank you!

Kathleen Yip ky2@cpuc.ca.gov

Public Comment Period

- For any technical issues with the Webinar, please call the Technical Support Line at 415-703-5263
- If you wish to speak during the public comment period, please unmute your phone, dial 1-800-857-1917, passcode 5180519#, and then press *1 (star one), and record your name and organization, if applicable, when prompted. Please speak clearly. You will be placed into a queue in the order that you have identified yourself. When it comes time for you to speak, the operator will announce your name and then open your line. You will have **one** minute to speak, after which a chime will sound when your time expires. To withdraw your request please press *2 (star two).

Thank you for your Participation!

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