



April 11, 2018

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cleantechsandiego.org

Honorable Steven Bradford, Chair
Senate Banking and Financial Institutions Committee
State Capitol, Room 405
Sacramento, CA 95814

RE: SB 1087 (Roth): Property Assessed Clean Energy (PACE) Program - OPPOSE

Dear Chairman Bradford:

MISSION:

To accelerate
clean technology
innovation and
adoption of sustainable
business practices
for the benefit of
the economy and
the environment

On behalf of Cleantech San Diego, please accept this letter of opposition to SB 1087 (Roth), which creates problematic requirements for property assessed clean energy (PACE) programs by rendering PACE inoperable as a point of sale product.

Cleantech San Diego is a member-based trade organization that works to support the cleantech industry throughout Southern California, as a global leader in the cleantech economy. Our members include more than 100 local businesses, universities, governments, and nonprofits committed to advancing sustainable solutions for the benefit of the economy and the environment.

Last year, two landmark laws, AB 1284 (Dababneh) and SB 242 (Skinner) were passed creating a new regulatory and consumer protection framework for PACE. Cleantech San Diego supported these bills with the goal of strengthening PACE as an important financing option that allows homeowners to make energy and water-saving retrofits. PACE is a valuable public-private partnership that helps government achieve climate and energy-saving objectives, while also creating local jobs that support a clean energy economy.

While SB 1087 purports to be a technical cleanup bill, we are concerned that the bill inadvertently hinders the PACE industry from being able to operate given the fundamental changes to underwriting requirements that were just enacted into law by AB 1284. The bill also adds an undue level of regulatory burden that is not found in any other form of financing just as the industry is cooperatively preparing for the new regulatory framework. It's critically important that the industry have time to work through the transformative changes made through SB 242, AB 1284, and AB 2693 and the Department of Business Services rulemaking process before making any further fundamental revisions to PACE's procedures and processes.

Thank you for your consideration of our concerns.

Sincerely,

A handwritten signature in black ink that reads "Jason Anderson".

Jason Anderson
President and CEO
Cleantech San Diego

Cc: Honorable Richard Roth, Senate Banking and Financial Institutions Committee
Eileen Newhall, Staff Director, Senate Banking and Financial Institutions Committee
Tim Conaghan, Consultant, Senate Republican Caucus