

December 2, 2020

NYC Department of Finance

Re: Proposed Rule for the Establishment of Sustainable Energy Loan Program

AEA PUBLIC COMMENT:

The definition of Lenders in Section 58-02 refers to the need for pre-qualification pursuant to the Program Guidelines but no such Program Guidelines seem available for review and comment. Additional information is necessary to ensure potential lenders are aware of and able to participate in the program and to ensure stakeholders have the opportunity to provide comment on pre-qualification requirements.

Given the rules seem to refer to Program Guidelines that have been issued by NYSERDA but that do not cover lender requirements, the rules should more clearly specify the NYSERDA Program Guidelines where that is the intent (e.g., for Energy Audit certification, etc.) and where the reference is to what we assume will be forthcoming NYC-specific guidelines. Any New York City specific Program Guidelines should be made publicly available for review and comment.

Section 58-08 covering project reporting also refers to Program Guidelines. The suggested reporting requirements in NYSERDA's Guidelines should be the minimum requirements. Reporting should be done at least annually in a transparent and publicly accessible manner and should include sufficient information for the public to evaluate the size, scale and impact of the PACE program.

Respectfully submitted,



Valerie Strauss
Director of Policy & Regulatory Affairs