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Re: Weatherization Assistance Program (WAP) Prequalified List

Dear Sirs and Madams:

The data and economic development subcommittee of the Green Affordable Housing Coalition (GAHC) writes to request that HUD and DOE continue to maintain the Weatherization Assistance Program's (WAP) Prequalified List (the "Prequalified List"). The GAHC is a national action network that fosters collaboration and advocates for the development and preservation of green affordable housing. The data and economic development subcommittee is focused on increasing the availability of high quality data and analysis that documents the value of increasing the energy efficiency of affordable housing.

Members of the GAHC data and economic development subcommittee ask HUD and DOE to maintain the WAP the Prequalified List. We believe the maintenance of this list accomplishes several things: 1) speeds the approval of multifamily affordable housing for WAP funding; 2) stands as a strong signal that WAP funding should be allocated for affordable multifamily properties; and 3) facilitates the inclusion of affordable multifamily properties in other rate-payer funded energy efficiency initiatives across the United States.

Given the nature of the GAHC and its members, we want to particularly stress the value of the Prequalified List for the affordable housing community's efforts to increase weatherization in affordable rental properties outside of WAP. The Prequalified List is extremely valuable for these efforts for the same reason that it was useful for WAP – it shortens the review process and lowers administrative burdens. For states, utilities, and other organizations in the early stages of

exploring ways to support and finance weatherization of affordable multifamily properties, the Prequalified List helps eliminate a major obstacle. As you know, historically the focus on low-income weatherization was on single family homes. Advocates across the country have had to work hard to help educate people who are unfamiliar with affordable multifamily housing how it works, who operates it, and who lives there – trying hard to dispel notions around undeserving occupants or “slumlord” owners. The Prequalified List helps to dispel these concerns. In addition, even when misperceptions are not at play, most state or utility programs do not have the resources or knowledge to screen affordable multifamily properties. The Prequalified List allows them to get to a better result, quicker than if they were forced to come up with a screening tool on their own. This in turn, should increase the number of affordable properties that are able to access weatherization resources – stabilizing their utility costs and ensuring sustainability. Moreover, it should be a direct benefit to HUD, as it should enable HUD-funded properties to access existing and emerging ratepayer-funded weatherization programs.

In order to help accelerate the creation of state and utility support for the weatherization of affordable multifamily properties, HUD and DOE should continue to maintain the Prequalified List with annual updates and corrections as needed.

The National Housing Trust is working on energy-efficiency related initiatives in eight states (Colorado, Minnesota, Illinois, Michigan, Ohio, Pennsylvania, Rhode Island and Maryland) and sees significant utility for the continued maintenance of the Prequalified List. By way of example:

- Utilities in Pennsylvania have expressed an interest in the Prequalified List as they explore extending weatherization services to affordable multifamily properties.
- In Minnesota, guidance for the Conservation Improvement Program (CIP), which requires its utilities to set aside a portion of their operating revenues for projects that reduce the consumption of electricity and natural gas, designates a certain amount of expenditure by utilities for the low-income residential market. Guidance for the CIP program explicitly refers to the Prequalified List, stating that “[a]ny building on the current DOE list is eligible for CIP LI spending.”

Similarly, the California Housing Partnership (CHPC) has been able to use a version of the Prequalified List to advance related work it is pursuing in California. Specifically, CHPC has worked with the National Consumer Law Center and the National Housing Law Project to pressure utilities in CA to adopt the Prequalified List approach. The California Public Utilities Commission (CPUC) has ordered a consultant to study this option. If the List were to be eliminated, it would substantially set back progress that has been made in getting the CPUC to address multifamily energy efficiency needs.

Accordingly, we request that HUD and DOE continue to maintain the WAP Prequalified List with annual updates and periodic corrections, as needed.

Sincerely,

ACTION-Housing, Inc.
Alliance for Environmental Sustainability
California Housing Partnership
Coalition to End Childhood Lead Poisoning
Council for Energy Friendly Affordable Housing
greeNEWit, LLC
National Center for Healthy Housing
National Housing & Rehabilitation Association
National Housing Conference
National Housing Trust
Pennsylvania Utility Law Project
Promise Energy, Inc.
Regional Housing Legal Services
St. Johns Housing Partnership, Inc.
Stewards for Affordable Housing for the Future
U.S. Green Building Council
Wienczek + Associates Architects + Planners

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