From: Cassidy Bolger <cbolger@mcrtrust.com>

Sent: Thursday, August 12, 2021 2:30 PM

To: PUC puc.publicmeetings * PUC < PUC.PUBLICMEETINGS@puc.oregon.gov>

Subject: Whole Building and Market Solutions for Multifamily

I am writing to offer public comment in support of extending the Energy Trust New Buildings whole building cost effectiveness exception through March 31, 2024.

As a market-rate multifamily housing developer, the Market Solutions Track is an excellent tool to help us to create more energy efficient buildings. We have been using the program on all of our projects for the last ten years. A typical project of ours takes 4-5 years from land acquisition to a completed building that is ready for occupancy. This process is complex and full of risk, and we value the reliability and ease of use the current program provides. The program as configured today provides knowledge upfront on what pathways are best for us to take based on the incentives we know we can earn. This knowledge is part of our underwriting and financial analysis from the start. If it were to become unreliable, or overly complex, we would not be likely to continue to engage the program.

Thank you for considering the extension to allow time to align the new offerings with the new code's whole building pathway.

Best,

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