

From: [Erin Lauer](#)
To: [PUC.puc.publicmeetings * PUC](#)
Cc: [Julie McEvoy Baines](#)
Subject: OPUC Public Comment for ETO Continuation of New Buildings Pathways
Date: Tuesday, August 24, 2021 10:51:19 AM
Attachments: [8-13-21 PHB Air Conditioning Requirement Memo.pdf](#)

To whom it may concern,

In regards to the Oregon Public Utility Commission request for determining the continuation or discontinuation of the Energy Trust of Oregon New Buildings Program Custom and Market Solutions pathways, Project Pivot requests the continuation of these New Buildings financial incentives programs through March 31, 2024, with the option to revisit every 6 months to determine the best financial incentives to be pursued. We understand that the Oregon Energy Efficiency Structural Code (OEESC) 2019 has changed significantly to require energy efficiencies. However, we request this continuation of the program due to the following:

1. The updated OEESC has not solved everything. Climate change is with us now, and we need to all make drastic measures within our building design and construction to continue to evolve and to achieve net-zero carbon and energy benchmarks by 2030 and if not definitely by 2050. (2030 feels like tomorrow, as we rapidly progress through our current decade.) Research exists that demonstrates our climate is warming by 3 degrees on our current trajectory, and that drastic measures can be taken to maintain this 3 degree increase without further increase, and was further documented in the recent [Sixth Assessment Report by the Intergovernmental Panel on Climate Change \(IPCC\)](#), and buildings account for about 35% of those carbon emissions. With ETO's financial incentives program, our design, development and building community can still be encouraged to push the boundaries that continue to push codes and standards (OEESC and ASHRAE 90.1) to implement the drastic change necessary to reverse or halt climate change.
2. The state of Oregon is in a housing crisis, and new housing through new building continues at a rapid pace. Many of these buildings are include partial or 100% affordable housing. These new multifamily building projects benefit tremendously from the ETO financial incentives in place. We work with local developers and property owners in multifamily housing who are just gaining knowledge of the complete portfolio of ETO incentives available to them and help these clients navigate the best path for them. We have seen clients take on early-design phase energy modeling who would not have done so before, to reduce energy usage dramatically through efficient equipment and HVAC&R equipment. The ETO helps reduce design and building costs for these new buildings and utility bills for tenants.
3. Per number 2 above, please see the attached memo from the Portland Housing Bureau's Green Building Policy now requires in-unit air conditioning to receive funding from PHB. This requires these building owners, design teams and builders to renavigate design and building techniques if energy is to be reduced. Financial assistance with energy modeling and/or with equipment and insulation incentives can help tremendously. These teams typically rely on duplicating the same processes per each new building for efficiency and cost reasons. Having both early design assistance and analysis incentives helps significantly rethink the design and building techniques typically used. (The requirement for in-unit cooling is due to temperature increases caused by climate change, which can be mitigated through energy reduction with financial incentive offerings from the ETO.)

4. Many of our clients are public entities that benefit significantly from ETO financial incentives. These include universities, libraries, parks buildings, metro buildings or public schools. The new buildings custom solutions incentivize these project teams meet early to integrate the best solutions to reduce energy cost savings earlier rather than later in the building phase, when changes are more costly. We also have been able to include key stakeholders, including students of all ages, in these decision-making processes. Thus the ETO financial incentives support a growing community of young leaders in energy efficient design.
5. Finally, we have commercial clients in hospitality and office environments, both which are sectors that are growing rapidly and in the new building sector. We continue to educate these clients about the benefits of energy efficient design to incorporate broad sustainable measures into the building's design from the beginning. In one example, we have a client that was going to completely give up on solar or solar ready, but learned about the ETO solar installation incentives that can help the owner move in the direction of solar PV installation. This same owner is considering computational fluid dynamic analysis and daylight analysis to lower utility bills in a space designed for optimal natural ventilation and daylight, due to the ETO new buildings custom pathway financial incentive offerings.

Please consider the continuation of these programs until March 31, 2024, to financially incentivize clients to move beyond the current code to halt or reverse the climate change we are experiencing.

Project Pivot is a women-owned, sustainability consulting firm in Portland, Oregon. Project Pivot offers services in sustainable building and planning, with a move forward in a positive direction. At Pivot, we always practice and learn how to harm less. This practice is applied to buildings as we work with your team to create healthier indoor and outdoor environments for building inhabitants and surroundings.

Sincerely,
Erin

Erin Lauer, AIA, LEED AP BD+C, Fitwel Ambassador
Project Pivot, Partner + Sustainability Consultant
ProjectPivot.net | erinl@projectpivot.net | 541.221.2272



Portland Housing Bureau

DATE: August 13, 2021
TO: PHB's development partners with active projects
FROM: Portland Housing Bureau
SUBJECT: Air Conditioning Requirement

As evidenced by recent extreme heat waves, summers in Portland are growing hotter and more dangerous due to climate change. Extreme heat poses a particular health threat to vulnerable populations. In keeping with our mission to serve vulnerable Portlanders, the Portland Housing Bureau (PHB) will now require in-unit air conditioning (A/C) cooling strategies in all new affordable residential buildings financed with PHB capital subsidies. PHB will be further assessing requirements for cooling strategies in existing affordable housing rehabilitation projects it funds.

PHB is asking affordable housing developers to propose an in-unit air conditioning cooling strategy that best balances the needs of their project and populations while ensuring the project's efficient use of public resources. Acceptable cooling approaches may include central air conditioning, packaged terminal air conditioners (PTACs), ducted or ductless condenser or heat pump units, window A/C units, portable A/C units, hybrid, geothermal, or other emerging technologies.

This requirement is effective August 13, 2021 for any project that has not yet closed financially. Projects that are already under construction are encouraged to identify opportunities for in-unit air conditioning cooling strategies within the existing financial parameters of the project in collaboration with PHB. If you have questions regarding this new requirement, please contact the Finance Coordinator or Senior Construction Coordinator assigned to your project.