



July 15, 2021

County Council
Montgomery County MD
Council Office Building
100 Maryland Avenue, 6th Floor
Rockville, MD 20850

RE: Bill 16-21: Legislation to Create Building Energy Performance Standards

Council Members:

Thank you for this opportunity to provide comments on Bill 16-21 to create Building Performance Standards (BEPS) for Montgomery County. The International Center for Appropriate and Sustainable Technology (ICAST) is a national nonprofit that designs and promotes clean energy programs that meaningfully impact disadvantaged communities. We achieve our mission of providing triple bottom-line, i.e., social, economic, and environmental, benefits to low-income (LI) populations by providing energy efficiency and renewable energy (EERE) retrofits to multifamily affordable housing (MFAH). Our MFAH clean energy solutions reduce utility costs for LI residents and improve the quality of their homes, making them healthy and safer.

ICAST currently manage the multifamily weatherization assistance program for the State of New Mexico and energy efficiency programs for nine utilities in six states, including the whole building deep energy retrofit program for Pepco. As implementer of the Pepco program, we are helping MFAH owners and property managers in DC comply with the District's Building Energy Performance Standards (BEPS), and as implementer of the Ameren-Missouri MFAH EE program, helping owners comply with the St. Louis, MO BEPS.

ICAST **supports** Bill 16-21 and the creation of a BEPS for the County. As an EERE service provider, ICAST is well-acquainted with the limitations and regulations MFAH properties encounter in making energy upgrades to their properties. We encourage the Council to work closely with the affordable housing community in designing and implementing specific provisions of the BEPS to ensure MFAH owners and property managers can comply with and meet its requirements in a timely manner. Additionally, we recommend that MFAH properties are given a guaranteed compliance path which will work for 15 years as the vast majority of MFAH owners and property managers do not have the ability to invest in upgrades every five years and, as necessary, refinancing for energy upgrades often must be done in a manner that meets specific federal and/or state requirements. We believe a BEPS has the capacity to help Montgomery County meet the growing climate change issues facing our communities, and believe – if properly implemented – it can also improve the quality of MFAH for the benefit of LI residents.

Thank you for the opportunity to provide input to and support of the Montgomery County BEPS legislation. Please feel free to contact me should you have any questions or need any clarification about ICAST's comments.

Sincerely,

A handwritten signature in black ink that reads "Ravi Malhotra".

Ravi Malhotra
Founder and President

International Center for Appropriate & Sustainable Technology

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