



May 22, 2015

**BEFORE THE PUBLIC SERVICE COMMISSION  
OF THE STATE OF MISSOURI**

In the Matter of a Working Docket to Review )  
the Commission's Missouri Energy Efficiency )  
Investment Act (MEEIA) rules ) File No. EW-2015-0105  
4 CSR 240-3.163, 4 CSR 240-3.164, )  
4 CSR 240-20.093, and 4 CSR 240-20.094. )

**SUPPLEMENTAL COMMENTS OF NATIONAL HOUSING TRUST**

The National Housing Trust hereby provides comments regarding PSC File No. EW-2015-0105, which involves a review of MEEIA rules by the Missouri State Public Service Commission. These comments are in response to the final workshop of May 12, 2015.

**I. Organizational Background**

The *National Housing Trust (NHT)* is the only national nonprofit that protects and improves multifamily affordable housing through public policy advocacy, real estate development, and lending. NHT engages in policy work in all 50 states and owns over 2,700 units of multifamily housing across eight states and the District of Columbia. Since its inception, NHT has preserved or helped to preserve more than 25,000 affordable homes through real estate development, lending, and technical assistance.

NHT recognizes energy efficiency improvements to multifamily affordable housing as a powerful tool to achieve Missouri's public policy objectives, lower expenses for owners and

residents, maintain housing affordability, and improve the health and comfort of building occupants.

## II. Comments

The National Housing Trust is pleased to provide Comments for the consideration of the Public Service Commission in this important matter. The following Comments relate specifically to policies that ensure that hard-to-reach sectors such as low-income and multifamily are adequately served by MEEIA programs.

Many states have adopted carve-outs, set-asides, flexible cost-effectiveness testing, or other provisions to address issues of equity for hard-to-reach sectors. In order to contribute to the discussion of how Missouri can best address sectors such as low-income multifamily housing and provide clear, actionable guidance for utilities, we offer the following examples from across the country:

- For Pennsylvania efficiency programs, utilities must obtain **4.5% of their energy savings** from the low-income sector (statute indicates the size of the low-income programs should be based on the low-income share of territory-wide energy use, per the statewide potential analysis). ([Implementation Order](#))
- In Minnesota, utilities are required to spend a certain **% of residential revenues** on low-income energy efficiency programs. The percentages are at least 0.2% for municipal gas, at least 0.4% for public gas, and at least 0.2% for electric utilities. Additionally, utilities must “provide programs for low-income persons, including low-income renters.” ([Minnesota Statute 216B.241 Subd. 7 \(a\) and \(c\)](#))
- In Maine, electric and gas utilities contribute funding to a statewide program administrator, which must target at least **10% of its funding** to low-income residents. ([Maine Statute Title 35-A](#))

- In Massachusetts, all investor-owned utilities contribute to the statewide Mass Save program administrator, which must spend at least **10% of its electric funding and 20% of its gas funding** on low-income programs. ([Green Communities Act](#))
- In Oregon, **13% of energy efficiency bill charges collected** must go to low-income weatherization (from electric public purpose charges on customer bills). ([Oregon Senate Bill 838](#))
- In Vermont, in order to address low-income ratepayer equity, the statewide efficiency program administrator must **spend a set dollar amount** on low-income programs, based on this sector's estimated contribution to the on-bill Energy Efficiency Charge. ([Public Service Board Order EEU-2013-01](#))

This is a non-exhaustive list of legislative and regulatory policies, but we hope it will further discussion on this topic.



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