

Support SB 1588

To the committee,

The energy efficiency gap isn't primarily a technology problem or even an awareness problem, but a transaction cost and capital access problem with specific market failures that

Here's what Inclusive Utility Access (IUI) that no other existing mechanism does as well:

Capital access. Over half of Americans have subprime credit; a third can't cover \$400. IUI isn't a loan: no credit check, no personal debt. It reaches a population that rebates and financing programs structurally cannot.

Uptake. Programs operating today show dramatically higher customer acceptance than debt-based alternatives. "Your bill goes down immediately" is an easier sell than "here's a favorable loan," and if the goal is deploying efficiency at volume, that difference is what matters.

Landlord-Tenant Split incentives. The meter-tied charge means neither landlord nor tenant fronts capital or takes on debt, while both benefit: the tenant from lower bills, the landlord from better tenant retention and property improvements. No other widely available mechanism resolves this as cleanly.

Utilities as the right vehicle. They have billing relationships with every customer, granular usage data for savings modeling, lower borrowing costs than individual consumers, existing regulatory oversight, and 99%+ cost recovery rates.

Utility alignment. Regulated utilities already must pursue least-cost resources; demand-side efficiency qualifies. IUI lets them earn a return on these investments (potentially as a regulatory asset) while deferring expensive supply-side infrastructure, benefiting all ratepayers.

Other tools fall short. Tax credits require tax liability and upfront payment. Rebates don't eliminate upfront costs. On-bill loans require credit checks. Direct government weatherization programs (WAP) are perpetually underfunded. IUI fills the gap none of these cover: comprehensive upgrades for credit-constrained or renting households, no upfront cost, no debt, immediate net savings, through existing institutional infrastructure.

Respectfully, I urge your support for SB 1588.

Juno Suarez