

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