

IN THE SUPREME COURT OF FLORIDA

CASE No.: SC14-1603

FLORIDA BANKERS ASSOCIATION,
Petitioner,

v.

STATE OF FLORIDA, et al.,
Respondents.

ON APPEAL FROM THE CIRCUIT COURT OF THE SECOND JUDICIAL
CIRCUIT IN AND FOR LEON COUNTY, FLORIDA
Case No.: 2014 CA 000548

***AMICUS CURIAE* BRIEF
FOR
PACENow**

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STATEMENT OF INTEREST OF AMICUS CURIAE PACENow

PACENow is a national non-profit advocacy group whose mission is to provide advice, information and resources in support of property assessed clean energy (“PACE”) financing programs for energy efficiency and clean energy upgrades to homes and buildings. PACENow supports successful energy financing programs on a national level, including those programs that have developed, and that are developing, in the State of Florida. PACENow provides services and resources to both governmental (public) and private organizations, including PACE program providers, local governments, energy service companies (“ESCOs”), property owners, law firms, financial firms, and others who have a commitment to PACE financing programs for energy efficiency and clean energy upgrades.

As an organization working nationwide to support entities that create clean energy solutions, PACENow’s interest in the preservation and enforcement of Section 163.08, Fla. Stat.,—the Florida Property Assessed Clean Energy Act (the “Florida PACE Act” or the “Act”) as well as the financing methods for PACE operations, is substantial. PACENow can assist the Court based on its national perspective and experience with PACE as no other organization can and provide independent information regarding the importance of this financing tool. The Amended Final Judgment validating

bonds to be issued by Appellee, Florida Development Finance Corporation will uphold the benefits contemplated by the Florida PACE Act, supported on a national level by PACENow.

SUMMARY OF ARGUMENT

Nationally, but in particular in Florida, PACE programs have become recognized and accepted mechanisms for facilitating the financing of energy conservation, energy security, and the reduction of GHGs. *See* § 163.08(1)(b), Fla. Stat. In 2010, Florida joined the growing list of states to adopt legislation allowing for PACE program financing.

The Florida Bankers Association (“FBA”) is asking this Court to find unconstitutional Florida legislation that is valid based on longstanding Florida law. Indeed, the Act’s use of special assessments is characteristic of PACE legislation in 30 other states and the District of Columbia. Finding Florida’s PACE Act unconstitutional would set a dangerous national precedent signaling that courts may not uphold long held authority of local governments to use their central assessment powers for public benefits such as those derived from PACE programs. In fact, almost all state statutes explicitly authorizing PACE programs include numerous safeguards, identical to those found in the Florida PACE Act, to protect property owners, local governments and financial institutions alike making PACE a successful energy financing tool. Accordingly, PACENow respectfully suggests

that the Court should affirm the trial court's judgment upholding the bonds to be issued by the Appellee, Florida Development Finance Corporation.

ARGUMENT

I. Property Assessed Clean Energy Programs are Nationally Recognized for Achieving Energy Efficiency and Other Benefits; Florida's Act Offers These Same Benefits to Fulfill Compelling State Interests

PACE programs allow property owners to finance energy efficiency, renewable energy, and in Florida, wind resistance projects for homes and commercial buildings via repayment through non-ad valorem assessments on the property owner's annual property tax bill imposed by the local government. Some California communities are even investigating PACE as a tool to finance "soft story" retrofits or those that make buildings and homes more resilient to seismic events. *See* City of San Jose Memorandum (October 2014) at <http://sanjoseca.gov/DocumentCenter/View/36442>. The Florida PACE Act has some of the strongest language of any PACE statute nationally establishing the public purpose behind PACE. This public purpose is embraced by state and local governments to encourage energy efficiency and renewable energy upgrades in buildings and homes.

As of 2008, energy use in 114 million households and more than 4.7 million commercial buildings was higher than the transportation or industry sectors, accounting for nearly 40% of total U.S. energy use. *See* U.S. Department of

Energy, *Energy Efficiency Trends in Residential and Commercial Buildings*, p. 4 (Oct. 2008), at http://apps1.eere.energy.gov/buildings/publications/pdfs/corporate/bt_stateindustry.pdf.

Electricity accounts for 90% of the site energy consumed by Florida households, and the annual electricity expenditures of \$1,900 are 40 percent higher than the U.S. average, according to an Energy Information Administration (“EIA”) Residential Energy Consumption Survey. *See* U.S. Energy Information Administration, *Florida Quick Facts*, <http://www.eia.gov/state/?sid=fl> (last updated Mar. 27, 2014). Because of its ability to allow property owners to implement energy saving retrofits, the Florida PACE Act is a tool that offers great potential to reduce energy use and save people money simultaneously.

A. PACE Programs Enjoy Documented Success Across the Country in Numerous States

PACE legislation was first enacted in California in 2008. Since then, 31 states and the District of Columbia (representing nearly 80% of the U.S. population) have adopted PACE enabling statutes. *See* PACENow, *PACE Market Overview* (2013), at <http://pacenow.org/wp-content/uploads/2013/12/12.17.2013-PACE-Market-Overview.pdf>. Although early programs in California and New York focused mostly on residential property improvements, commercial PACE programs have flourished with financing currently available in nine (9) states

through twenty-six (26) different programs with an additional twelve (12) new programs in development in nine (9) additional states. *Id.*

In Florida, six (6) PACE programs have been formed, including two (2) that operate in single-county jurisdictions (St. Lucie and Leon) and four (4) that are comprised of multiple local governments (such as the Appellee, Florida Development Finance Corporation). Programs serving both residential and commercial property owners have gained acceptance across most of the U.S. *Id.*

In residential PACE programs, the marketplace continues to expand. Nationally, approximately 25,000 homes have been upgraded using PACE financing through currently available residential PACE programs. *See* PACENow, Residential PACE (2014) at <http://www.pacenow.org/residential-pace/>. The cost of these upgrades totals nearly \$500 million and has resulted in the creation of 7,500 jobs. *Id.*

In commercial PACE Programs, the PACE marketplace is nascent, yet already boasts over \$100 million in completed projects on approximately 300 buildings through 18 separate and distinct programs. The value of these completed projects ranges from as little as \$5,000.00, up to \$7,000,000.00 financed. *See*, PACE Market Overview, at 2. Additionally, more than \$300 million in commercial PACE project applications have been received by existing PACE programs collectively across the country. *Id.*

There are a multitude of different financing options for energy efficiency upgrades, but PACE is the only program to show signs of nationwide success. This is attributable to the following:

First, PACE program assessments are added to the homeowner's annual property tax bill and paid once per year, creating a simplistic form of repayment. *See, Council on Environmental Quality, Recovery Through Retrofit: Saving Homeowners Money and Creating Jobs* (2009), www.whitehouse.gov/administration/eop/ceq/initiatives/retrofit. This unique arrangement attaches the costs of the energy retrofit(s) to the property, not the individual, eliminating uncertainty about recovering the cost of improvements from the debt issuers if the property is sold. *Id.*

Second, PACE programs provide 100% of a project's cost, so property owners avoid the up-front costs that are a common barrier to certain energy-efficiency upgrades, including solar energy infrastructure installation. *See Wilson, J. et. al., The Great PACE Controversy* (2011), at <http://www.ourenergypolicy.org/wp-content/uploads/2012/03/Wilsonv25n3.pdf>.

Moreover, PACE program financing allows property owners to pay for project improvements through a long-term (5 to 20 year repayment duration depending on improvement type/lifespan), fixed-cost financing option that is underwritten by the value of the property (not the property owner's credit). *Id.* Since the repayment is

in the form of a property assessment, rather than an individual or business' balance sheet, the property owner immediately realizes savings from lowered utility bills. Finally, in a well-designed PACE program, total energy savings to the property owner that will be realized by the suite of PACE improvements exceed the total cost of the PACE assessments. This also has the effect of improving the property owner's monthly cash flow and decreasing the risk of mortgage default.

Third, PACE program projects result in job creation in the energy efficiency and renewable energy sectors. Studies show that for every \$10 million in private spending that is put to work through implementing PACE programs, the benefits include the creation of 150 jobs, \$25 million in economic output and \$2.5 million in federal, state and local tax generation. ECONorthwest, *Economic Impact Analysis of Property Assessed Clean Energy Programs (PACE)*, (April 2011), at <http://www.pacenow.org/wp-content/uploads/2012/08/Economic-Impact-Analysis-of-Property-Assessed-Clean-Energy-Programs-PACE.pdf>. There is a potential nationwide market for commercial and residential PACE of nearly \$280 billion over the next ten (10) years that would translate to over \$1 trillion in energy savings, over 3 million jobs, and 600 million fewer metric tons of carbon emissions per year. See Rockefeller Foundation and DB Climate Change Advisors, *United States Building Energy Efficiency Retrofits: Market Sizing and Financing Models* (2012) at <http://www.dbcca.com/research>

Fourth, considerable data exists establishing increased property values because of energy efficiency and renewable energy upgrades made through PACE. The premiums placed on efficient properties include: lower operating costs, improved internal comfort, reduced utility costs and better quality living and workspaces. As one example, in California, homes with photovoltaic (“PV”) systems have sold for a premium over comparable homes without PV systems. See Hoen, B. et. al., Berkeley National Laboratory, Environmental Energy Technologies Division, *An Analysis of the Effects of Residential Photovoltaic Energy Systems on Home Sales Prices in California* (April 2011) at <http://emp.lbl.gov/sites/all/files/lbnl-4476e.pdf>. Additionally, case studies nationwide from 2009 to 2011 confirm that “green labeled homes”, (designated as such for their energy rating) routinely sell for a premium price when considering percentage-of-sales-price and per-square-foot price. See Bloom, B. et. al., *Valuing Green Home Designs: A Study of ENERGY STAR® Homes*, 3 *The Journal of Sustainable Real Estate* (April 2011) at <http://www.josre.org/wp-content/uploads/2012/09/JOSRE-Volume3-20111.pdf>

B. Florida Plays a Key Role in Furthering PACE Nationally

The Florida Legislature adopted the PACE Act to facilitate energy financing in Florida in 2010. The Florida PACE Act allows local governments to provide innovative financing making all of the above discussed benefits available to

Florida property owners. As one of the top four (4) most populated states in the country, this makes PACE financing available to a population of approximately 19.5 million persons. *See*, U. S. Census Bureau, State and County Quick-Facts. By not affirming the bond's validity here, this Court will thwart the legislative intent behind the Florida PACE Act, and prevent many Florida property owners from reaping the benefits offered by Florida PACE programs.

II. The Senior Lien Structure and the Special Assessment Mechanism for PACE Financing are Important to the Success of PACE Programs in Florida and Nationwide

A. Importance of the Senior Lien Structure

Under most PACE Acts, including Florida's, assessment liens for energy retrofits enjoy superpriority over prior-recorded encumbrances. There is longstanding precedent in federal and state law regarding a local government's authority to levy non ad valorem or special assessments in this manner. Thus far, most PACE projects have been funded from programs through the sale of bonds issued by qualified political jurisdictions, and through direct investment by private funds that have been established to finance the growing PACE market. *See* PACE Market Overview, at 3. The senior lien structure makes PACE attractive for investors because the financing is tied to the property (in the form of a lien) reducing risk of default and lowering the interest rate to property owners.

Mortgage lenders and other investors are well-protected against loss severity in the event of default or foreclosure because the mortgage lender is only at risk for the amount of the PACE assessments that are owed and unpaid over the course of the delinquency, as opposed to being at risk for the entire debt. *Id.* See also, PACENow, White Paper, p.16 (2013), at <http://www.pacenow.org/wp-content/uploads/2012/07/PACE-White-Paper-2010.pdf>. Additional risk protection for mortgage holders results from the increase in property value that properties improved through PACE financing enjoy and the fact that property owners are in a better position to pay mortgages because their utility bills are reduced. *Id.*

B. Importance of Special Assessments for a Successful PACE Program

Courts have long recognized that legislation affording priority to special assessment liens over prior mortgages or deeds of trust on the property assessed does not violate either federal or state constitutional provisions. See, PACENow, White Paper. With PACE programs, the assessments are not loans; they are liens against the property (recorded) that are extinguished when they are paid off in full. These are tantamount to any other local government assessment that takes a senior position and provides a public benefit. And, use of the assessment mechanism is critical to the success of the program because it makes the financing affordable resulting in more participants.

C. PACE's Success over Other Energy Financing Tools

While there are other energy efficiency financing programs in existence, none have achieved the level of success that PACE has, in terms of successful projects and participation. One type of program, “on bill financing”, has been utilized but has significant barriers in that utilities may not have the human resources to administer these programs; utilities may not have the expertise, the means, or the desire to become lending institutions; and such programs may require a redesign of utilities' billing systems. In many cases, less than 1% of those eligible participated in these programs. *See* Bell, C., S. Nadel & S. Hayes. American Council for an Energy-Efficient Economy, *On-Bill Financing for Energy Efficiency Improvements: A Review of Current Program Challenges, Opportunities, and Best Practices*. ACEEE report number E118. Washington, D.C. (2011) at <http://www.aceee.org/sector/state-policy/toolkit/on-bill-financing>.

Energy loan, line of credit and energy mortgage products are not a solution for those middle income households motivated to pursue energy efficiency because they need access to low-cost capital. These products typically have higher interest rates, loan application fees, shorter repayment terms (5-10 years) than PACE and must be fully repaid before sale of the property. Many of the largest energy efficiency loan programs have application decline rates in the 30 to 50% range largely due to credit score requirements. *See* Zimring, Mark, Merrian Borgeson,

Ian M. Hoffman, Charles A. Goldman, Elizabeth Stuart, Annika Todd, and Megan A. Billingsley, *Scaling Energy Efficiency in the Heart of the Residential Market: Increasing Middle America's Access to Capital for Energy Improvements* (2012) at <http://emp.lbl.gov/publications/scaling-energy-efficiency-heart-residential-market-increasing-middle-americas-access-ca>. Finally, other states, including Maine, Vermont, Rhode Island, and Oklahoma, have decided to subordinate the status of residential PACE liens. However, this approach is not as attractive to investors, since junior liens are less secure, and the programs have not achieved as high participation rates as other PACE programs. See Consortium for Building Energy Innovation, Pennsylvania State University, *New Approaches to Financing Energy Efficiency Investments* (last updated April 29, 2014) at <http://research.cbei.psu.edu/research-digest-reports/property-assessed-clean-energy-pace-financing>. PACE does not suffer from these same challenges.

CONCLUSION

PACE programs continue to grow on a national level. In Florida, Appellee, Florida Development Finance Corporation's, program is just one of many emerging PACE programs. The validation of bond financing for this and other PACE programs is critical to their success in Florida and across the nation. PACE's reliance on senior lien non ad-valorem special assessments is not only lawful, but is correct, practical, effective and essential. The importance of

PACE on a statewide and national level, as described in this brief and others filed in support of the Florida PACE Act, establish the necessity for the affirmance of the bond validation in this case.

Respectfully submitted this 11th day of December, 2014.

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I HEREBY CERTIFY that a true and correct copy of the foregoing has been served via the Florida Courts E-Filing Portal upon the following attorneys, as well as all Electronic Service Recipients listed on the Electronic Service List of the Florida Courts E-Filing Portal, on this 11th day of December, 2014:

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