



MATADORS COMMUNITY CREDIT UNION
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July 12, 2013

Brad Copithorne
Financial Policy Director
Environmental Defense Fund
123 Mission Street, 28th Floor
San Francisco, CA 94105

Regarding the Proposed Decision of Administrative Law Judge Darling, Agenda ID #12219,
Application 12-07-001 et al

Dear Mr. Copithorne:

Matadors Community Credit Union (MCCU) is excited by the Commission's work in promoting energy efficiency financing. We are particularly excited about the potential of an On-Bill Repayment program to dramatically increase the volume of energy efficiency projects currently financed and undertaken. As an experienced lender in the energy efficiency space and sole state-wide participant in the CAEATFA program, MCCU has had first-hand experience with what works and what doesn't. With only a few minor changes to the Proposed Decision, OBR has the chance to work, and work well.

First and foremost, an OBR obligation must be treated as a tariff under the meter for the duration of its life. In other words the obligation must remain part of the utility bill even if the owner or occupant changes via a sale, tenancy change, or foreclosure. While MCCU agrees with a robust disclosure requirement as contemplated by the Commission, we believe that making the obligation contingent on the consent of future occupants allows them to opt-out of the obligation. It would be impossible to lend if repayment obligations could simply be disregarded during their term. Finally, the OBR obligation must be considered equal in repayment priority to the regulated energy charge on the utility bill.

MCCU believes that an OBR program that survives foreclosure, is not contingent upon consent of future owners or occupants, provides adequate disclosure, and is treated equal to the energy charge on the utility bill may significantly grow the energy efficiency market.

MCCU was established in 1963 as a not-for-profit Credit Union serving Cal State University Northridge. Today, MCCU is an active community lender that delivers excellent products and services to a broad customer base. In addition to CAEATFA, we are the primary lender for Energy Upgrade California in Los Angeles County and now the new Southern California Regional Energy Network.

Thank you for your time and consideration.

Sincerely,

A handwritten signature in black ink, appearing to read "Mark Tsimanis". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Mark Tsimanis
Vice President / Chief Lending Officer
Matadors Community Credit Union
(888) 993-6901 x 210