



April 22, 2022

Ms. Kelly Speakes-Backman
Office of the Assistant Secretary
U.S. Department of Energy
Office of Energy Efficiency and Renewable Energy
100 Independence Ave, SW
Washington, DC 20585

RE: Revolving Loan Fund RFI

Dear Assistant Secretary Speakes-Backman:

On behalf of the more than 17,000 members of the largest organization of professional real estate appraisers, we write to you in response to the Department of Energy's ("DOE") Request for Information ("RFI") on designing, managing, and improving Revolving Loan Fund programs. We applaud your agency for soliciting comments from industry stakeholders to gather ideas on how to effectively serve a wide array of borrowers with beneficial energy efficiency products and services.

The Appraisal Institute strongly supports the DOE's revolving loan fund programs, but we remind the DOE for the programs to be highly successful, they must have strong collateral valuation requirements. We stress that appraising high performance properties requires enhanced competency and the services of highly qualified appraisers. An appraiser should know how to identify green or energy efficient components and how to value them prior to accepting the assignment.

Green and Energy Efficient Addendum

The Appraisal Institute encourages the DOE to adopt the Green and Energy Efficient Addendum, a form to help appraisers, lenders, investors and others understand the value of energy-efficient features in commercial or residential properties that will assist in the capturing of green and energy efficiency data and analysis by appraisers. As a leader in the green valuation space, the Appraisal Institute created the first-of-their-kind addendums to allow appraisers to identify and describe a property's green features, from solar panels to energy-saving appliances. In its current state, the standard appraisal forms devote limited attention to energy efficient features, so green data usually doesn't appear in the appraisal report, or it is included in a lengthy narrative that often is ignored.

The Appraisal Institute would be happy to meet with you to discuss this further, but if you have any questions, please call Bill Garber, Director of Government Relations for the Appraisal Institute, at 202-292-5586 or bgarber@appraisalinstitute.org, or Brian Rodgers, Manager of Government Relations, at (202) 298-5597 or brodgers@appraisalinstitute.org should you have any questions.

Sincerely,

Appraisal Institute