PACE Wisconsin Program Guidelines

Date: December 8, 2021

To: Wisconsin PACE Commission

From: Slipstream, PACE Wisconsin Program Administrator

Subject: PACE Wisconsin Program Guidelines

Background

At its April 1, 2019 meeting, the Wisconsin PACE Commission approved the current version of PACE Wisconsin Program Guidelines ("Guidelines"). Since approval of the current Guidelines, the commercial real estate and clean energy markets have continued to evolve; new best practices have emerged nationally in the administration of C-PACE programs; and Slipstream has applied the current version of the Guidelines to dozens of additional projects.

To reflect developments in these markets and insights that Slipstream has gained through administration of the PACE Wisconsin program and other C-PACE programs, Slipstream developed proposed revisions to the PACE Wisconsin Program Guidelines and presented the proposed changes to the Commission at its September 13, 2021 meeting and sought out stakeholder input. This memo summaries the resulting changes from the current 2.2 version to this 3.3 Version that is before the Commission for adoption.

Summary of Proposed Adjustments

- Section 1.0. Introduction
 - o Effective Date
 - If the commission adopts the changes in December the new document would go into effect February 1, 2022.
- Section 2.0. Definitions
 - o Added:
 - Adaptive Reuse
 - Completion Verification Report
 - Energy Use Intensity (EUI)
 - Expected Useful Life
 - Greenhouse Gas Emissions
 - High Performance PACE Project
 - Incremental Cost
 - Site Energy Use
 - Small PACE Financing
 - Source Energy Use
 - o Altered:
 - Large PACE Financing PACE Projects with PACE Financing amounts that are greater than\$250,000 that include funding for one, or more, ECMs. The

portion of the PACE Financings Project Cost that is used only for Brownfield Revitalization Projects are not treated as Large is excluded when determining whether a PACE Financing, regardless of the amount of the Financing is a Large PACE Financing.

- PACE Financing A fixed-rate loan that is executed through a PACE Special Charge and Financing Agreement made by a PACE Capital Provider to an Eligible Property Owner for a PACE Project, also defined in Appendix B "PACE Financing Ordinance" as a "PACE loan."
- Renewable Energy Improvement: added "An energy storage system that is connected to the renewable energy source may also be included as part of a Renewable Energy Improvement."
- Savings-To-Investment Ratio- removed "This ratio is calculated by dividing the sum of the guaranteed cash flow savings over the project's useful life by the cost of the PACE Project."
- Removed:
 - Application Fee
- Section 4.2. Eligible Projects
 - Added clarity around small projects and EUL.
 - Removed: Repayment terms for PACE Financings for Brownfield Revitalization Projects are not limited by the life of the improvements and may exceed 20 years.
 - Added: An ECM that uses a different fuel source than the equipment that it will replace is eligible if it either reduces 1) total annual site kBTU consumption for the property; or 2) results in reduced annual Greenhouse Gas Emissions (see definition in Section 2.0) from energy consumption for the property.

• 4.2.1 High Performance PACE Projects ADDED

- A High Performance PACE Project is defined as a property that meets one of the criteria listed below. The Commission may also designate projects that do not meet the requirements listed below as High Performance PACE Projects if the Commission finds, in its sole discretion, that the project generates exceptional environmental sustainability benefits.
- Include a Renewable Energy Improvement and at least three Energy Efficiency Improvements and/or Water Efficiency Improvements. The Renewable Energy Improvement, as well as the Energy Efficiency Improvement(s) and/or Water Efficiency Improvement(s) must be significant ECMs, as determined by the Program Administrator. This requirement may be applied to new construction projects and to existing buildings.
- Reduce Source Energy Use Intensity (EUI) to the EUI target identified in ASHRAE 100 – 2018, for the applicable building type. This requirement may be applied to existing buildings.
- $\circ~$ Achieve modeled energy consumption for the property that meets the requirements of ASHRAE 90.1 2019.
- Reduce estimated energy usage by at least 20 percent below the amount of energy that would be consumed in a comparable code-minimum building.

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- Achieve LEED BD+C v4.0 (or later) Silver or Gold certification and receive a minimum of four points on the Energy Optimization credit.
- Section 4.3. Energy Assessment Requirements
 - Adjusted: An Eligible Property Owner must obtain an Energy Assessment for the PACE Project, if the PACE Project includes the installation of one, or more, ECMs. If the PACE Project includes only Brownfield Revitalization Project(s), the Applicant is encouraged to evaluate eligible clean energy improvements but is not required to obtain an Energy Assessment.
 - Added: The final Energy Assessment for a PACE project must be developed based on "for construction" document sets and must include the information listed below. If "for construction" documents are not applicable for a project (ex. an equipment replacement on an existing building), the Energy Assessment may be prepared based on alternative documentation that provides a comparable level of certainty and detail about the improvements that will be installed (ex. purchase order).
 - Clarified: Estimate of the useful life of each ECM., including a reference to the basis for the estimate of the EUL (such as the Wisconsin Focus on Energy Technical Reference Manual). The EUL shall be the expected lifetime of the subject equipment or building component and shall be determined independently of the expected lifetimes of related building systems.
 - Added information about High Performance Building assessment requirements
 - Added: For Small PACE Financings, the Program Administrator may accept an Energy Assessment prepared by Focus on Energy if the Program Administrator determines that the Focus on Energy Assessment provides sufficient analysis and detail to support the requested PACE Financing.

• Section 4.3.2. Renewable Energy Improvements- UPDATED

For all PACE Projects that include a Renewable Energy Improvement, the Eligible Property Owner must submit a Renewable Energy Feasibility Study, or similar document. The Renewable Energy Feasibility Study must, at a minimum, include the following components:

- Description of current site and building conditions that are relevant to the installation and/or performance of the Renewable Energy Improvement
- Specific location for the Renewable Energy Improvement at the Eligible Property
- Type, or source, of renewable energy that will be generated and nameplate capacity and efficiency rating of the Renewable Energy Improvement
- Description of the proposed Renewable Energy Improvement
- Statement of the use of the energy produced by the Renewable Energy Improvement (ex. offsetting on-site energy demand, exporting to the electric grid, selling renewable natural gas, etc.) for which the Renewable Energy Feasibility Study's economic analysis was prepared.
- Utility consumption profile of the site, including the site's historic energy use and cost. For new construction or adaptive reuse projects, in place of historic energy use, the Renewable Energy Feasibility Study shall include the modeled projected energy use of the building
- Projected annual energy production

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- Projected total energy production during the estimated lifetime of the Renewable Energy Improvement
- Projected energy and financial cost savings to be generated by the Renewable Energy Improvement, including assumptions affecting the cost savings:
 - Weighted cost of energy saved and generated by the project
 - Cost savings to be realized from time-of-use and demand charge reductions
 - Utility tariff to be applied to the site and/or system following installation
 - Utility escalation rate assumptions
 - Tax benefits and other incentives
 - Expected Useful Life of the Renewable Energy Improvement
 - Estimated maintenance expenses
- Amount of total project capital cost of the Renewable Energy Improvement.
- Utility tariff under which the Renewable Energy Improvement will be interconnected with the electric grid (if applicable), as well as any anticipated grid interconnections issues.
- Description of utility tariff, if any, to be applied to system production that exceeds consumption.
- If energy production may periodically exceed electricity demand for the applicable electric meter, an analysis of impacts of surplus energy generation by the Renewable Energy Improvement
- Appropriate requirements to maintain optimized system performance for monitoring the system functionality and performance.

Certain additional information is required if the Renewable Energy Improvement includes an energy storage system.

- Description of the energy storage system
- Nameplate energy storage capacity
- Estimated reduction in electricity demand charges to be enabled by the energy storage system

The Renewable Energy Feasibility Study should be prepared based on the Eligible Property Owners' intended use of the Renewable Energy Improvement. Allowable uses of a Renewable Energy Improvement include generation of electricity to supply the on-site demand of the facility or export of electricity to a utility provider, or a combination of the two options. Renewable Energy Improvements that produce clean heat or power by use of a renewable energy source such as biomass or biogas, and which comply with the requirements defined in the Program Guidelines shall be considered eligible PACE Project types.

• Section 4.3.3. Electric Vehicle Charging Systems- UPDATED

For all PACE Projects that include an Electric Vehicle Charging System, the Eligible Property Owner must submit an assessment of the benefits of the Electric Vehicle Charging System. This assessment must show that the Electric Vehicle Charging System qualifies as a fuel-

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switching Energy Efficiency Improvement in which vehicles will switch from gasoline or diesel fuel to electricity as the primary fuel source. This assessment must include:

- Description of the proposed Electric Vehicle Charging System
- Projected energy consumption of the Electric Vehicle Charging System, based on a statement of assumptions regarding the number and frequency of vehicle charges, as well as the vehicle categories that will be charged
- Estimated annual reduction in consumption of gasoline and/or diesel fuel that will result from installation of the Electric Vehicle Charging System. The annual fuel reduction estimate should differentiate between the reduction in fuel used for vehicles owned and/or operated by Applicant and the reduction that will be realized by vehicle owners other than Applicant.
- Analysis showing the net change in kBtu consumption and/or Greenhouse Gas Emissions generated by the reduction in gasoline and diesel use and the corresponding increase in electricity consumption.
- Analysis of cost savings and revenue to be achieved by Applicant from the Electric Vehicle Charging System, including reductions in consumption of transportation fuels, revenue from fees charged for third-party use of the Electric Vehicle Charging System, and operations and maintenance cost savings.
- Analysis of cost savings to be achieved by other (non-Applicant) users of the Electric Vehicle Charging System.
- Indication of utility tariff through which electricity used by the Electric Vehicle Charging System will be purchased, as well as a statement of any anticipated interconnection issues.
- Present a summary of the estimated implementation cost for the measure, the simple payback period in years, and the simple return on investment of the project.
 - Assumptions affecting the analysis, including, but not limited to:
 - Utility and fuel cost escalation rate assumptions
 - Tax benefits
 - Estimated Useful Life of the Electric Vehicle Charging System

Baseline:

The energy generation baseline for all Electric Vehicle Charging Systems is an internal combustion engine used for the vehicle category(ies) to be charged.

• Section 4.3.4. New Construction PACE Projects UPDATED

New Construction PACE Projects are required to exceed the requirements of the state of Wisconsin Energy Conservation Code. The baseline for new construction projects is the minimum level of equipment efficiency required by the current applicable building energy code or applicable ASHRAE 90.1 standard. For any new construction PACE Project that follows the performance or prescriptive path the Applicant must demonstrate through the Energy Assessment that the PACE project exceeds the applicable IECC or equivalent ASHRAE 90.1 standard established in the state of Wisconsin building code. The state of Wisconsin publishes the Wisconsin Building Code and Energy Conservation Code, plus any amendments here:



https://dsps.wi.gov/pages/Programs/CommercialBuildings/Default.aspx

NOTE: Wisconsin State Law prohibits localities from establishing local energy codes that differ from the State of Wisconsin energy code.

The date the building permit is issued, for the subject new construction PACE Project, and the Energy Conservation Code that is in place at that time, will determine the appropriate effective date and corresponding minimum new construction baseline that will apply to the Energy Assessment for the new construction PACE Project.

The Energy Assessments for a new construction project may demonstrate expected energy or water savings over this baseline in one of three ways:

- If the project's energy code compliance follows the prescriptive pathway. The measure-by-measure savings must be calculated using an appropriate methodology such as the Focus on Energy Wisconsin Technical Reference Manual or other widely accepted approach adjusting for interactive savings effects between measures. For example, lighting energy savings should adjust for impacts on heating energy. Under this pathway, HVAC baseline systems must be like-for-like systems with code compliant efficiencies.
- 2. For projects that do not comply with Wisconsin Energy Conservation Code through the prescriptive pathway, one of the following whole building energy modeling procedures must be used: IECC Total Building Performance, ASHRAE 90.1 Appendix G Performance Rating Method, or ASHRAE 90.1 Energy Cost Budget Method. Under this pathway, HVAC system baseline systems must follow the applicable baseline table within the energy code.
- 3. A whole building energy model may also be used for projects that would comply with Wisconsin Energy Conservation Code through a prescriptive review following the criteria under number two.

To assess the lifetime savings of a mix of measures a savings weighted EUL shall be calculated. Within the energy assessment measures should be incrementally added to the analysis starting with envelope ECMs then lighting, equipment and controls, HVAC, and DHW. The sum of the line-by-line savings for each measure must equate to the total savings of the comprehensive proposed model. The lifetime savings is calculated by summing the products of the measure's EUL and savings then dividing by the total whole building savings.

Water reduction calculations should use an appropriate baseline and methodology such as those established in the Wisconsin Focus on Energy Technical Reference manual or other documented practice.

An Energy Assessment for a new construction project shall include the following additional information:

- Code compliance pathway applied to the Energy Assessment
- Energy analysis procedure followed
- Detailed description of baseline equipment used in comparative energy analysis
- Key assumptions on building usage, such as schedules of hours of operation



- Detailed description of proposed measure performance parameters used in the analysis
- Clear impact of building components which are known by the Energy Assessment provider to not meet prescriptive code, where applicable, such as window-to-wall ratios above the performance baseline
- Individual measure EUL and collective lifetime energy savings of the ECMs

Adaptive Reuse and Vacant Building Baseline:

PACE Wisconsin recognizes the potential economic development and environmental benefits of adaptively reusing existing buildings and supports the use of PACE Financing to prepare existing buildings for new uses.

For an Adaptive Reuse project or a substantial (gut) renovation of a vacant or underutilized building, certain existing components of the building, such as ventilation equipment, may no longer be relevant to the new intended use type. However, other aspects of the building, such as the building envelope, may be transferable to the new use type.

The Energy Assessment for an Adaptive Reuse or substantial renovation project should apply one of the following baselines upon which to calculate energy savings:

- 1. Current Wisconsin Energy Conservation Code minimum level of energy performance, as would be used for a new construction PACE project.
- 2. A mixed baseline that identifies 1) building components that could be reused in the new use type for the property and 2) building components in the existing structure that are no longer applicable within the new use type. The mixed baseline shall use existing condition in the building as the baseline for the first category of building components and Wisconsin's Energy Conservation Code as the baseline for the second category of building components.

Energy Assessment of Adaptive Reuse projects should include a clear explanation of the baseline, including operability, remaining useful life, engineering applicability, and performance information for each of the existing systems considered. The information to be included in the Energy Assessment for an Adaptive Reuse Project shall be the same as that information required for an Energy Assessment for a New Construction PACE Project.

Section 4.4 Retroactive Projects UPDATE

 Updated: All such retroactive PACE Financings must occur within thirty months of the time elapsed between the completion of the installation and application of the PACE Financing, unless otherwise approved by the Program Administrator. For New Construction projects, the date of completion shall be the date that the certificate of occupancy was issued. For Existing Buildings, the date of completion may be determined based on information shown in the applicable invoice(s) or the date the installation was approved by a building inspector.

Required Documentation

Verification is required to establish prior conditions (baseline) and describe the new Energy Conservation Measures installed in any such retroactive PACE Project. The Energy Assessment for a retroactive PACE Project shall include additional documentation that provides evidence of installation of the ECM(s) that are the subject of the PACE Project, as follows:

- Completion Date for the ECM(s) that are subject to the PACE Project
- Make and model of equipment replaced (describe the baseline)
- Wisconsin Energy Conservation Code compliance documentation
- Make and model of ECM(s) that are the subject of the retroactive Project.
- Photos supported by descriptions, which provide evidence of installation

Section 4.5 Eligible PACE Project Costs <u>UPDATED/ ADDED</u>

The PACE Project budget may include all Direct Costs required to install all ECM(S) included in the PACE Project as well as soft costs required to develop and finance the installation.

Eligible Direct Costs include all ECM Direct Costs necessary to complete the installation, such as and achieve the estimated project savings amounts. Examples of eligible direct costs include the installation/construction contract amount (materials, labor and overhead) and the cost of any required ancillary cost incurred property improvements that are required in order to complete the installation of an ECM. Examples of eligible ancillary costs are roof structural improvements necessary to allow the installation of a roof mounted solar PV array and building electrical upgrades necessary to install an efficient HVAC system or efficient lighting convert natural gas fired HVAC equipment to all-electric HVAC equipment. All such ancillary costs are subject to the Program Administrator's review and approval.

Eligible soft costs may include the cost of the following engineer's energy survey cost of the Energy Assessment, other required design and engineering, project development fees, Program Fees, permit fees, surveys, legal fees, Capital Provider fees, other third-party reports, (including LEED certification fees, where applicable), financing fees, fees associated with the issuance of bonds for the financing, interest reserves and capitalized interest. The Program Administrator and the Commission reserve the right to limit the amount of soft costs that may be included in the PACE Financing, if those soft costs may be considered excessive in comparison to the amount of financed direct costs. Soft costs shall be considered in the context of the levels of soft costs included with other PACE Wisconsin financings, and in light of any extenuating circumstances that may justify increased soft costs for the PACE transaction.

• Section 4.6 PACE Financing Greater Than \$250,000 UPDATED

For PACE Financings equal to or greater than \$250,000, which fund a PACE Project that includes one, or more ECMs, ("Large PACE Financings"), the Applicant must submit an Energy Assessment that describes the energy, water, financial and operational cost savings, as well as tax benefits, as described in the Energy Assessment, that will accrue from the proposed improvements being financed with, throughout the proceeds EUL of the PACE

Financing. Combined, these benefits those improvements. The estimated lifetime savings resulting from the improvements must achieve a Savings-to-Investment Ratio of one or for the project that is greater. Finally, than 1.0. These projected energy, water and operational benefits shall be guaranteed by the project engineer or the contractor pursuant to a Savings Guarantee. These requirements are further described below.

• Section 4.6.1. Savings-To-Investment Ratio > 1.0 UPDATED

The PACE Statute requires that these Large PACE Financings achieve a Savings-To-Investment Ratio (SIR) greater than one. To1.0.

All PACE Projects shall meet thisthe SIR requirement PACE Wisconsin requiresif the Energy Assessment shows that the energy, water, maintenance, and other documentable operations cost savings and financing & tax benefits over the estimated useful life of the Energy Conservation Measures must beis greater than the Direct Cost of the eligible improvements or the Large PACE Financing amount. The Program Administrator completes a reviewPACE Wisconsin recognizes that adaptive reuse projects create societal benefits by reusing existing structures and reducing the need for demolition and new construction. Therefore, the present value of the SIR as part of the application process. For the purposes of embodied energy in the SIR building structure that will be retained may be included in the calculation, the initial investment shall be of the Savings-To-Investment Ratio for the project. The calculation of value of embodied energy must be based on the Large PACE Financing amount or the eligible Direct Cost of the PACE Project. a generally accepted calculation methodology.

The Program Administrator completes a review of the SIR as part of the application process. The savings may represent the projected annual energy, water and maintenance cost savings and financing & tax benefits attributed to the PACE Project, as stated in the Savings Guarantee and Energy Assessment. The cost savings calculations for future years may be inflated based on documented inflation expectations established by historical prices and/or forecasts available from sources such as the US Energy Information Administration Annual Energy Outlook. Such savings may be inflated over a period of time equal to the useful life of the Energy Conservation Measure(s) installed in the subject PACE Project. The Energy Assessment for thea Large PACE Financing shall contain the energy engineersengineer's calculation for the ECM(s) life timelifetime savings as described above, including all assumptions.

Whether a Large PACE Financing achieves an SIR greater than 1.0 based on full cost of the measures, or based on the incremental cost of the measures, the PACE Financing may fund the full cost of the ECMs. Project Costs used for Brownfield Revitalization Projects are excluded from the SIR calculation.

Savings-To-Investment Ratio for High Performance PACE Projects

The Savings-to-Investment Ratio for High Performance PACE Projects may alternatively be calculated by forecasting the energy, water, and maintenance cost savings, as well as tax

credits, over the estimated useful life of the improvements and comparing total savings to the incremental cost of the ECMs above the cost of corresponding code-minimum measures. When incremental costs are used to calculate the SIR, the Energy Assessment must identify the equipment or material that is assumed to be the baseline measure, as well as the source for the cost assumption for that baseline measure. The Program Administrator will confirm the reasonableness of the baseline cost assumptions.

• Section 4.6.2 Savings Guarantee UPDATED

- Removed: Savings Guarantees are designed to facilitate the investment in cost effective energy conservation and clean energy measures by lowering the risk on the property owner's behalf to undertake the investment in a PACE Project.
- Removed: Engineering Commissioning and Verification Process
 To verify that the PACE Project is installed and performs according to projections
 modeled in the Energy Assessment and/or Renewable Energy Feasibility Study the
 written Savings Guarantee shall include an Engineering Commissioning and
 Verification process. The Engineering Commissioning and Verification process set
 forth in the Savings Guarantee shall meet the standards described in Appendix E:
 ASHRAE Audit and Commissioning and Verification Descriptions.

Upon completion of the commissioning process, the Applicant or their designated representative shall submit a post-construction commissioning report to the Program Administrator and PACE Lender. This report shall contain:

- 1. A statement that systems have been completed in accordance with the Energy Assessment and/or Renewable Energy Feasibility Study and contract documents, and that the systems are performing as expected;
- o Removed: EPA Portfolio Manager

In conjunction with the Savings Guarantee, Large PACE Financings are required to create an account on EPA Portfolio Manager, a free website that enables property owners to easily track energy and water use, compare their buildings against benchmarks, and determine Energy Star Ratings. Property owners can use Portfolio Manager to track improvements in building performance following completion of a PACE Project. For Large PACE Financings, PACE Wisconsin requires the following: Enter into Portfolio Manager at least twelve consecutive months of utility bills from the billing periods prior to project completion.

Share with PACE Wisconsin the Portfolio Manager (username: pacewisconsin) record for the subject property (see for instructions).

Following project completion, enter into Portfolio Manager at least twelve consecutive months of utility bills from subsequent billing periods.

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 Section 4.7 Brownfields Revitalization Project Assessment Requirements <u>UPDATED</u> The PACE Wisconsin Program Administrator will review an assessment of a Phase 2 Environmental Site Assessment (or comparable study, as determined by a qualified professional) for each Brownfield Revitalization Project based on the considerations

established under the applicable statute (WI Statute 238.13(3)), and as may be amended:

(a) The potential of estimated cost for each remediation action for the Brownfield Revitalization Project to promote economic development in the area, including Environmental Site Assessment (ESA) Phase 1 review costs and Phase 2 ESA investigation costs, such as soil sampling.

(b) The level of financial commitment by the Applicant to the Brownfield Revitalization Project.

(c)The extent and degree of soil and groundwater contamination at the project site.

(d) The adequacy and completeness of the site investigation and remediation plan.

(e) Any other factors considered by the corporation Program Administrator or the Property Owner to be relevant to assessing the viability and feasibility of the project

The Brownfield Revitalization Project portion of the cost of a PACE Projects that include only a Brownfield Revitalization Project are not required to achieve a certain may be excluded from the calculation of the Savings-To-Investment Ratio and not required to obtain for the project and may also be excluded from the Savings Guarantee.

• Section 6.0. Qualified PACE Capital Providers

• Added: PACE loans must be fixed rate loans and the term of PACE loans may not exceed the limit established by the Expected Useful Life of the ECM(s).

• Section 7.1 Application Fee <u>REMOVED</u>

- REMOVED THE FEE:
 - A \$300 fee is due to the Program Administrator at the time the Final Application is submitted to it for review. This fee is to be paid before the Program Administrator will begin review of the Final Application. A credit for the Application Fee will be applied toward the Program Fees assessed on an approved Final Application. Application Fees are to be sent to:
- Section 8.1.5. Close Financing & Execute PACE Special Charge and Financing Agreement
 - Made updates to the document list

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• Section 8.1.8. Project Completion

- Made updates to the Completion Verification Requirements and Reporting
- Upon completion of the PACE Project, for Large PACE Financings, the Contractor the Energy Assessment Provider, installation contractor, or their designated representative, will commission the installed Energy Conservation Measures per the commissioning plan included certify and provide evidence that the ECMs specified in the Energy Assessment, Renewable Energy Feasibility Study, or Electric Vehicle Charging System assessment for the



PACE Project. The have been installed as required to achieve the estimated energy, water, and operational cost savings forecast in the Energy Assessment. This certification is a Completion Verification Report (see template in Appendix I)

• Section 8.1.9 Energy Performance Reporting

- Changed to a Recommendation
- At least annually, Property Owner shall enter the property's energy consumption data into ENERGY STAR Portfolio Manager. Property Owners are requested to use the data sharing capabilities offered by ENERGY STAR Portfolio Manager to share the building's energy performance data with PACE Wisconsin (username: pacewisconsin. See Appendix F for instructions). Prior to loan closing, Property Owner is required to create an account on EPA Portfolio Manager, a free website that enables property owners to easily track energy and water use, compare their buildings against benchmarks, and determine Energy Star Ratings. Property owners can use Portfolio Manager to track improvements in building performance following completion of a PACE Project.

Slipstream welcomes any questions or comments from members of the Wisconsin PACE Commission regarding the stakeholder comments or the recommended responses to those comments. Please contact:

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