To whom it may concern:

This is in regards to the purchase of sub-meters with Proposition 39 funds.

We work with several schools as Energy Managers.

We have attended 2 meetings regarding the Proposition 39 Draft Guidelines and have asked questions regarding the purchase of Sub-meters for which we were told "needed to be clarified."

While it seems somewhat clear that sub-meters as part of an Energy Management System might be considered one of the strategies a school might implement, Table 3 on Page 9 does not clarify if sub-meters could be purchased as part of the "Energy Planning Reservation Option" to therefore be utilized to perform Energy Surveys and Data Analytics.

We would like the Energy Commission to recognize the importance of measuring with Sub-meters and their associated data analytic platforms for the beginning Energy Planning-stage and allow the purchase of this technology with pre-planning dollars.

Our experience in schools and other commercial buildings has been that deeper measurement within the buildings themselves (in addition to the utility meter and analyzing historical bills), saves customers valuable time and money by assisting in more accurate Benchmarking and Energy Project Identification and Prioritization. When paired with an actual walk-through energy audit, the anticipated energy saving results are even much greater.

It should also be noted that these sub-meters and data analytic tools can stay in place during and after the Energy projects in order to Measure & Verify the savings much more quickly and accurately. Moreover, these sub-meters can also be retained and utilized as part of the school's Energy Management System. The technology can even be utilized for Auto Demand Response strategies.

We are writing to ask the Energy Commission to please consider sub-meter purchases as viable to perform Energy Surveys and Data Analytics during the Energy Planning Planning Reservation Option.

Thank you for your consideration and thank you for implementing what will be looked upon as a major sea change for School Funding and the Energy Efficiency industry.

Sincerely,
Brent Locke
General Manager
Energtech Experts
818.324.1780