

Energy - Docket Optical System

From: Brent Locke [brent@energtechexperts.com]
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To: Energy - Docket Optical System
Subject: Docket Number 13-CCEJA-1 "Comments on Prop 39"

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California Energy Commission

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To Whom It May Concern:

I am writing as instructed because after attending 2 meetings for the Proposition 39 Draft Guidelines, I was not provided an answer to a question I raised.

We are Energy Managers who work with several schools.

My question is in reference to "prior technical validation of technology" as written on Page 18 of the Draft Guidelines. Specifically, I am referring to the last sentence of the section titled, "Option 3: Other Tools: Data Analytics," which is a subsection of "Step 5: Energy Project Identification."

The sentence basically states that to use any Prop 39 funds for data analytics tools, "an LEA must provide documentation of prior technical validation of the technology by a local utility."

My questions are these:

1. What specifically must this documentation contain?
2. By "local utility," does it mean that it has to be the utility that services that specific LEA?
3. What if a California Utility has indeed verified the technology but doesn't service the LEA?
4. Shouldn't the Energy Commission also accept validations from experts in the field of M&V (for example Lawrence Berkley Labs or KEMA)?

Moreover to question #4, it seems that some California utilities have only validated specific vendors that they specifically work with. By only letting Utilities validate technologies, this would seem to create unfair competition for other legitimate technologies wanting to be utilized by the LEAs. In addition, many utilities are (much like the EC and PUC admit) not able to offer technical validation because this is a new area in building energy science.

We therefore gratefully request that the Energy Commission consider defining more precisely what the validation documents must contain, honor the validation by any California utility so that the technology can be used throughout the State of California and that the Energy Commission be more open to what Organizations might be able to provide Technical Validation.

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,
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