

Energy - Docket Optical System

From: Frank DiLiddo [Frank.DiLiddo@fresnounified.org]
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To: Energy - Docket Optical System
Subject: Docket Number 13-CCEJA-1 "Comments on Prop 39"

Categories: Ready to Docket

California Energy Commission

DOCKETED
13-CCEJA-01

TN 72147

OCT. 23 2013

Re: Site-level and project- level savings requirements of Energy Savings Reporting (pg. 25).

Prelude:

In site-level reporting, benchmarking tools do not normalize data for additional energy loads that may impact a site in the 12-month (post-installation) period and completely negate any savings derived in the measure.

Benchmarking only takes into account regional weather factors. Analyzing a school's energy usage performance by comparing last year's bills with current year's bills is not an effective nor fair method of determining energy use reduction unless all things (conditions, factors) remain the same. I have found through my 11 plus years as an energy manager that it is extremely rare for a school to have identical conditions from the previous year. Too many factors!!

Since 2002, FUSD has been utilizing an energy accounting database system, EnergyCAP.

Systems like EnergyCAP provide a fair "Apples to Apples" comparison or a truer Use Avoidance of energy reporting and accounting.

This is accomplished by entering monthly utility bills during baseline(pre-installation) period and capturing details of existing building conditions, (e.g. equipment loads, sq footage, programs, typical usage patterns, construction, etc.)

Site auditing can verify any changes in a building's condition effecting load and consumption during post-installation period.

These delta changes can be quantified and entered into the database to compare current year consumption with normalized baseline data, apples to apples.

Use and cost avoidance of energy can be justified and quantified to more accurately reflect performance of installed measures.

QUESTION 1: Can we use EnergyCAP to perform baseline tracking of approved projects to satisfy the requirements of site-level reporting?

COMMENT 1: Remove "and" and supplant "or" for the energy savings report requirements. Provide option 1 or 2 as energy savings reporting requirement.

QUESTION 2: For LEA's that don't have an energy database system, could planning funds be used to purchase the system?

COMMENT 2: Remove "Benchmark" and supplant "Baseline" in language

COMMENT 3: Remove site-level energy reporting requirement altogether since benchmarking will rarely truly reflect energy savings derived by installation of the measure.

Re: SIR calculation

QUESTION: Can Project Costs (material and labor) be "best-projected cost" using historical pricing info or are LEA's required to supply actual quotations from contractors?

Thank you,

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