

Elk Grove Unified School District
Comments on Proposition 39 Program Implementation Draft Guidelines

The Elk Grove Unified School District appreciates the opportunity to comment on these important Draft Guidelines. This is an exciting program that the voters of California have entrusted us with. We applaud the California Energy Commission for their hard work, dedication, outreach, and practical yet professional approach exhibited throughout the implementation of this program.

- As currently written the guideline requirements for a Local Education Agency (LEA) appear to be somewhat onerous and will require significant additional staff time and/or significant specialty consultant services, especially for larger LEA's. The California Energy Commission (CEC) may consider a more streamlined process for straightforward energy saving projects such as lighting retrofits and HVAC replacements.
- We are concerned that the limits placed on planning dollars and the funding limits for the two planning categories, Screening and Energy Audits (85%) and Program Assistance (15%), are not adequate to build an effective four or five year expenditure plan. The CEC may consider allowing greater flexibility for LEA's to spend the planning dollars as they see fit within the two categories. We feel that the Program Assistance category may entail greater costs than the current 15% limit to establish an effective long term program and expenditure plan.
- With regard to the requirement for LEA's receiving over \$1,000,000 to spend no less than 50% of the funds on projects that are at least \$250,000 in value we would strongly encourage the CEC to consider defining a project as a contract for work. Defining a "project" as a single school site will result in more than 50% of our funds to be spent on less than 10% of our schools. As the program moves into years 3, 4, and 5 the current requirements and definition of project will result in LEA's such as ours spending \$250,000 or more at individual school sites and projects that will not result in as much energy savings as would otherwise occur if for example we could have a very large multi-school lighting retrofit project to satisfy the \$250,000 and 50% requirements.
- Please consider allowing all LEA's regardless of their award level to submit five year expenditure plans. This will be beneficial for LEA's to build a single effective plan and model. This will also allow all LEA's to spend their one-time year one planning money on establishing their complete plan. The five year plan could be amended as needed.
- It seems that the Energy Expenditure Plan and ensuing form(s) will be critical elements of the program and as a result LEA's would respectfully appreciate having a chance to review and comment on the required program forms before they are finalized.
- If not already allowed (the guidelines appear to be silent on this) please consider allowing LEA's to submit an expenditure plan that exceeds their five year Proposition 39 allocation.
- If not already allowed (the guidelines appear to be silent on this) it would be advantageous for the overall program if LEA's were allowed to package projects into single bids even if that includes packaging high ranking priority projects with those that are farther down the list of priorities or order in the expenditure plan. This would encourage efficiency and economies of scale thus leading to a more effective use of the funds.
- It is our understanding that LEA's will only be required to benchmark sites that receive project funding. Please consider clarifying this on the guidelines.