Energy - Docket Optical System

From: Energy - Prop39
Sent: Friday, October 25, 2013 2:25 PM
To: Energy - Docket Optical System
Cc: patti@rcsaa.com
Subject: FW: Proposition 39 Comment - Docket 13-CCEJA-1

Thank you for your comments. They have forwarded to the Docket to be logged in for consideration.

-----Original Message-----
From: Patti Herrera [mailto:patti@rcsaa.com]
Sent: Friday, October 25, 2013 8:27 AM
To: Energy - Prop39
Subject: Proposition 39 Comment - Docket 13-CCEJA-1

Good morning,

On behalf of the Riverside County Superintendent of Schools and the 23 school district superintendents in Riverside County, I would like to offer the following comments in addition to the comments we submitted as part of a joint letter dated October 15.

1. EXPEDITED REVIEW/APPROVAL FOR CEC-SEQUENCED PROJECTS

We respectfully request that the CEC amend the Draft Guidelines to provide for an expedited review and approval process for the timely disbursement of Proposition 39 allocations for districts that certify they will comply with the priority of energy efficiency projects pursuant to the CEC's Sequencing of Facility Improvements (Exhibit B) when appropriating their Prop. 39 funds. The types of projects in the SFI are known to achieve the greatest energy efficiency for the level of investment; thus, it makes sense for the Guidelines to accommodate expedited review and approval when a district certifies it will comply with the project "loading order" found in Exhibit B.

2. PLANNING GRANTS

We respectfully request that the CEC consider allocating additional funding beyond the $2.8 million for planning grants under the Bright Schools Program in the initial year or two of Prop. 39 implementation. We believe that many districts may require technical assistance to assess and plan their energy efficiency projects in the immediate year(s). We believe that SB 73 does not bind the CEC to the current planned appropriation of the $28 million dollars the budget allocated toward low/no-interest loans and planning grants. Thus, we ask the CEC to consider additional funding for planning grants.

3. REPORTING REQUIREMENTS

Finally, we wish to echo the comments made by the San Diego USD and others regarding the onerous quarterly reporting requirements as proposed in the Draft Guidelines. We instead ask the CEC to consider working with the Education Audit Appeals Panel (EAAP) that is tasked with revising the annual Audit Guide to which all LEAs are subject to accommodate annual review and audit of Prop. 39 funds. We believe that the

existing school audit review structure can serve the purpose of monitoring the deployment and use of Prop 39 funds without overly burdening districts with additional reporting requirements.

Thank you for the opportunity to comment. Please do not hesitate to contact me with any questions. I can be reached at patti@rcsaa.com or by phone at (916) 325-1162 - O/(916) 216-2363 - C.

Patti F. Herrera
Office of the Riverside County Superintendent of Schools Division of Governmental Relations