

**Comments on Proposition 39**

**To: California Energy Commission**  
**RE: Docket number 13-CCEJA-1**  
**From: Carol Schmitt and Jody London**  
**Date: October 25, 2013**

We want to thank the California Energy Commission (CEC), Department of Education, and all of the other agencies and legislators statewide who have worked so tirelessly to implement Prop 39 and SB 73 to attain the best results for California's schools and the students and communities they serve.

It's been an amazing effort with special recognition and thanks to Deborah Godfrey, Marcia Smith and their team at the Energy Commission for their work. The staff has juggled complex questions and subject matter gracefully and efficiently. Similarly, staff at the Department of Education have straddled the extremely difficult task of Prop 39 allocation calculations for over 2000 LEAs. Overall, it is hoped that the final Guidelines will include:

**A powerful database and strategic data analytics infrastructure**

With the State lacking an inventory of public school assets in California, the information being collected as part of Prop 39 benchmarking, audits and annual reports – including addresses, square footage per building, age of buildings, energy/square foot, climate zones, solar, etc -- can lay the groundwork for a strategic database of these assets.

The guidelines are not specific as to what shape or investment will be made in this highly desired database. There is no stipulation for actively combining this information over the term of Prop 39 to provide predictive analytics. There are no stipulations to actively seek to combine other State data assets with the Prop 39 "database", including procurement and project data from the Department of State Architects or health and water data or student performance and other data.

This should be a priority as data can be the strongest tool to assuring future investment results.

**A commitment to modify Guidelines as further cost/benefit metrics are developed.**

Along with recognizing as much as 3% benefit from "non-energy" benefits, the ability to add in Savings to Investment or SIR calculators as the benefits of things like water conservation, behavior modification or plug-load savings are formalized by the CEC and/or other agencies.

**Resource specificity for Collaborative Improvement**

As schools become involved, particularly smaller Local Education Agencies (LEAs), in Prop 39 projects, the hope is that the State agencies driving the program will look for constant means to multiply results. Specifically, this includes:

**Taking an active leadership role in collaborative procurement**

To create easy-to-attach to bulk negotiated pricing and best terms for everything from lighting and HVAC replacement equipment to solar. Schools do not have the infrastructure or personnel to drive this on their own. Nor will they have a consolidated database of products or services procured by other LEAs as will the CEC.

### **Student involvement/curriculum**

Best practices and programs for energy curriculum for students of all ages are available. However, there are few (any?) Common Core approved, effective or well-constructed programs that virtually any LEA could use to connect student learning with their school's sustainability efforts.

### **Better clarification of purchasing restrictions, the "sole source" questions**

As this issue was mentioned at nearly all of the Prop 39 Guideline comment meetings, how to purchase from existing contracts or vendors needs further clarification. The preference is for schools to not have to spend more on legal fees or staff time to address procurement.

### **Formation of a "Help Desk" schools staff can call/text/chat**

Schools need a trusted resource for quick answers, access to best practices, RFP builders and just random technical assistance not predicated upon going through the Bright Schools application process. A Help Desk can provide technical advice as needed in a confidential, non-judgmental way that helps risk-adverse LEAs recommend and make changes more confidently.

### **Energy Resource Manager "Startup" Support**

The Energy Manager/Resource Manager opportunity is resonating with larger districts and personnel who are or have previously experienced the advantages of such expertise integrated into LEA administration. However, we need to provide formal support for small and disadvantaged LEAs to come together to share such expertise and function. These LEAs may not come together themselves as there is no established center for such collaboration. And without extra program initiative or funding, most County Offices of Education won't offer programs because staff cannot support it.

### **SIR by total investment versus by project by project SIR final evaluation**

Although each project needs to have an SIR of its own, in the final reckoning, is recommended that evaluation be based upon the entire LEA's overall SIR. The combination allows for mixed investments that suit priority needs of the LEA while achieving overall a 1.05 SIR or greater.

It is also asked that Public Comment also be allowed for the SIR calculators themselves.

### **Create "Click-Wrap" agreements for LEAs to approve access by CEC to Investor-Owned Utility data**

Today's forms are clumsy, manual, and do not make it simple for LEA to transfer all data, particularly when dealing with multiple utilities, etc. This process must be simplified.

### **ECAA-Ed fund provide mechanism for private monies to mesh in a "socially responsible fund."**

Within terms of projects and payback currently, enable LEAs to group together or singly develop their own local Green Revolving Fund to assure investments continue post Prop 39.

Thank you for the opportunity to comment and for the effort to make Prop 39 investments go further and provide lasting results for our schools!

Carol Schmitt and Jody London

Mobile: 408.656.6895 and 510.459.0667

Email: [cschmitt@acclimateus.com](mailto:cschmitt@acclimateus.com) and [jody\\_london\\_consulting@earthlink.net](mailto:jody_london_consulting@earthlink.net)