October 25, 2013

Dear California Energy Commission,

Energize Schools submits the following Proposition 39 Draft Guidelines recommendations for your consideration.

We recommend that Proposition 39 funds are allowed, recommended, or required for the following uses:

- Launch and support energy conservation initiatives and behavior change programs that include student engagement
- Support K-12 project-based energy education, including student-conducted energy audits
- Energy Efficiency operational improvement programs such as retro commissioning and ongoing maintenance of mechanical systems
- District planning and policies to ensure ongoing energy improvement, such as clean energy revolving funds or shared savings
- Resources for retrofits that are not performing as well as expected
- The training of up to four staff members. We recommend raising the training limit from $1,000 to $5,600. The Building Operator Certification is a staff-training program that costs an average of $1,400 and is a proven curriculum delivery model for enabling staff to identify and address retrofit and commissioning opportunities. Through third-party verification, BOC graduates have demonstrated savings between $12,000-$20,000 annually.

We recommend the following modifications of the guidelines:

- Page 17: Allow the use of multiple options for identifying energy projects by changing “one” to “from” in the following sentence: “LEAs shall choose one of three options to identify energy projects: 1) an energy survey, 2) an ASHRAE level 2 energy audit or 3) data analytics.”
- Limit the competitive bidding requirement to retrofit services. Many LEAs already have trusted planning partners, and the bidding process for both Planning and Retrofitting services will be unduly arduous and time-consuming
- We recommend that LEAs be allowed to use Proposition 39 funds for planning over the entire five-year period
About Energize Schools

*Energize Schools* is a holistic energy efficiency, conservation, and energy education services program for K-12 schools. The goal of Energize Schools is to make it easy and affordable for schools to invest in Energy Efficiency retrofits while engaging students in energy conservation, education, and leadership. The non-profit partnership of Strategic Energy Innovations (SEI), Bay Area Climate Collaborative, PECI, and Ecology Action (the Team) is a network of non-profit efficiency experts with combined delivery capabilities to help school districts holistically approach energy management – from the board room to the boiler room to the classroom – delivering deep savings while engaging students in hands-on energy workforce education & training. The partnership will ensure school districts can maximize the state’s 5-year, $2.5 billion Proposition 39 investment, and provide support beyond the reach of those resources.