

Prop. 39 CEC draft Guidelines, Rev 2 . Comments October 24, 2013

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GENERAL

Energy Planning/ Activities

1. Consider increasing the Energy Planning funding amounts, and/or allow the same funding amounts to be applied for again in year 3. (Program assistance amount at 15% of planning awards are insufficient.
2. Strongly consider much more flexibility in spending of Planning amounts . For example, some district may already have a lot of energy audits or retrocommissioning, reports and or can find other means of getting audits such as through utilizes resources, or Bright Schools, or CA conservation corps,etc.. Allow LEAs to spend up to a maximum of 75% in any 1 category if you must have limits in :screening, survey, audits , or Program assistance OR capacity building for planning activities.
3. Suggest the CEC advise LEA's to take a portfolio-wide (whole district) approach in energy planning and identifying energy management activities for the whole district first, including : energy waste reduction through A. occupant behavior management, B. facilities staff operational efficiencies (proper scheduling of controls, settings, evening, weekend and holiday shutdowns, computer power management through software and policies for powering down, plug load reduction, etc.) and THEN other energy efficiency projects.
4. LEAs may need to expend design costs or other soft costs during planning phase , especially first year in order to define project expenditure costs—are these to be covered by the Planning funding? If so, the Planning funding may be insufficient, and also should be funded at the start of each year of funding to supplement current 30% of 1 year funding or \$1 M for Tier 4, for example. Suggest allowing up to additional 20% of each subsequent year's Funding for Planning activities and capacity building.
5. Question: Why does the Large Expenditure Plan award requirements require the 50% of a \$1M + award be used for large projects> \$250,000? Seems too restrictive? How about recommending?
6. Clarify when training and funds for Energy Manager awards may be requested—please allow at same time as Planning funding so that the Energy Manager can actually lead or partake in the Planning activities!
7. Suggest greatly increasing the amount allowable for spending on “Training” to 4-5% or \$35,000, whichever is greater, for a whole LEA. Allow any excess training funds to be utilized to build capacity internally to LEA's for energy management/reduction activities including policy and behavior-based .
8. Please make editorial corrections to language in pg 12 “Award Funding for Energy Manager(S)” to allow for multiple energy management positions if LEA's award can allow. Thus tier 1 , 2 and or 3 energy managers , for example could be allowed. (many Tier 4 LEAs will then not be tied to having to hire only ONE energy Manager for over \$100,000! Edit language to allow for “energy management personnel. “
9. Please publish typical EUI's for each climate region, thanks.
10. Clarify that all schools need to be benchmarked—not just the sites where projects are proposed. See 3. Above, re portfolio wide approach to identify true priorities.
11. Clarify CEC definition of “Lowest energy Performers” on pg 14 benchmarking process figure 1. By EUI per Sq. ft.? by region? Or by electricity or ?

12. Clarify that E,Star Portfolio Manager benchmarking is truly meaningful for CA schools with natural ventilation, very little mechanical loads, and many multiple buildings spread over one campus with 1 -4 meters shared amongst 10-20 building envelopes?.
13. Is net present value I the best metric for public K-12 schools?—why not absolute kwh values or ? other for prioritizations pg. 14-15.
14. Please clarify items (10 and (11) in this table on page 15., of Step 3.
15. In step 4: sequencing approach pg 16?, Please consider adding in step 1 as: “ First reduce demand, and eliminate energy waste through occupant behavior-based management program projects, and operational efficiency by internal staff and policies and best practices (see 3. Above).
Then second, maximize energy efficiency... etc.”
16. Clarify that a “Project” may be many actions on one site as well as may be a select set of actions over multiple sites. AND that a project could be a behavior-based set of actions for energy management over one or multiple school sites over the course of one year, and that these energy efficiency projects may allowable funded expenditures submitted in annual or 5-yr Expenditure Plans.
17. Will DSA define what EE projects will or will not trigger DSA review for Prop. 39?
18. For Energy Savings Reporting Requirements, pg 27—these 4 A-D options sdo not seem to report either by IPMVP or real ACTUAL absolute values of savings by KWh or KBTU or Therms. Suggest these simple metrics be reported. – and that ‘deemed’ savings not be relied upon solely for reporting. The data based on actual performance will be valuable to the CEC in the future .
19. If examples of projects can include insulation, please clarify inclusion of inserting natural daylighting with shading.control devices and energy management controls systems can be typical energy efficiency projects as well.may already be in Exhibit B?
20. Consider recommending LEA’s start an internal shared operational savings (general fund, school site, and facilities green revolving fund)program and contribute a portion to seeding an internal green revolving fund to leverage Prop. 39 funds beyond the 5 years of the program..
21. Clarify water conservation /efficiency measures are allowable but not limited to as in Exhibit B ?
22. Are Rcx projects allowable? If so how is the Rcx report to be funded –in order to define the project and to quantify the costs—but not allowed as an up front cost in planning funding?
23. Please clarify inclusion of EMS and programming controls, scheduling optimization etc. are included allowable EE projects.
24. Thanks for including behavior-based energy management programs/projects as funded EE Project examples in Exhibit B. is 10% an acceptable equivalent of ‘deemed savings’ ?
25. On pg 41, why are automatic controls such as EMS such a low priority 4? (or were you only saying the DR part of it was Priority 4?
26. Please clarify Prop 39 funding Pathway example Exhbiit C---the LEA Independent responsibilities on pg 43 (DSA compliance etc.)Seem to be allowable funding activites by Prop 39 funds , right?
27. ON pg 45- note cost based EUI’s may MASK utility discounts and conversely exaggerate where utilities have NOT given LEA’s the best /fair rates. Require that rate schedules be reported and transparent.
28. Page 46—when Identifying Lowest energy performers, suggest breaking down by actual electricity and gas consumed (per sq. foot for EUI) to provide averages, not by COST, to identify real energy use.
29. Clarify how effective useful life of measures in years is developed? Thank you.