CALIFORNIA TEACHERS ASSOCIATION

1705 Murchison Drive, Burlingame, CA 94010
P.O. Box 921, Burlingame, CA 94011-0921
phone 650.697.1400 // fax 650.552.5007

December 16, 2013

VIA E-MAIL AND U.S. MAIL

Docket Office
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512
docket@energy.ca.gov

Re:Docket No. 13-CCEJA-1 – Proposition 39 Draft Guidelines – Failure To Address Mandate to Fund Repairs that Contribute to Related Health and Safety Conditions in Public Schools.

Dear Docket Office:

On behalf of the 325,000 members of the California Teachers Association, I respectfully submit our concerns on the Proposition 39: California Clean Energy Jobs Act 2013 Program Implementation Draft Guidelines ("Draft Guidelines"). Principally, the Draft Guidelines neglect to include Proposition 39's mandate that funds for energy efficiency retrofits for public schools also include funding for "related improvements and repairs that contribute to reduced operating costs and improved health and safety conditions."

California schools have been denied sufficient financial resources to maintain facilities and improvements since 2007. Proposition 39 recognized this and expressly mandates that funding for energy efficiency upgrades in public schools can be used to fund related repairs and improvements that contribute to improved health and safety conditions. This mandate is consistent with guidance from the United States Environmental Protection Agency that indoor air quality and other aspects of school building performance that are critical to healthy and effective learning should be addressed when planning and designing programs to improve energy efficiency in existing K-12 school buildings.

We strongly urge the Commission to revise the Draft Guidelines in order to address Proposition 39's mandate to fund related health and safety improvements in public schools *in addition to* energy efficiency improvements.

The Draft Guidelines must also more accurately reflect the benefit of improving the indoor environmental quality of classrooms. The Draft Guidelines currently assign an

arbitrary 3% additional economic benefit for non-energy related benefits such as improvements in health and safety. This arbitrary percentage is much lower than the 10% additional economic benefit number that was recommended by the California Department of Education in their May 14, 2013 Recommendations for Proposition 39 K–12 Project Guidance.

We hope that either a qualitative approach be applied to assessing health and safety benefits or that an economic approach be developed that takes into account the economic benefits both to the school and the state economy from increased attendance rates, improved health and substantially improved academic performance.

Thank you for your serious consideration of our requests to refine the Draft Guidelines. We appreciate the hard work necessary to develop the Draft Guidelines and believe our recommendations will meet the spirit and intent of Proposition 39.

Sincerely,

Dean E. Vogel, President
California Teachers Association

C: CTA Board of Directors

DEV:TT:tp