

December 18, 2013

Robert B. Weisenmiller Ph.D.
Chair, California Energy Commission
1516 Ninth Street, MS-33
Sacramento, CA 95814

Andrew McAllister
California Energy Commission
1516 Ninth Street, MS-31
Sacramento, CA 95814

RE: Docket # 13-CCEJA-01: Comments on the Proposition 39 Program Implementation Guidelines

Commissioners Weisenmiller and McAllister:

Advanced Energy Economy (AEE) is a national organization of businesses who are making the global energy system more secure, clean, and affordable. Member companies represent a wide range of technologies from energy efficiency, demand response, renewable energy, natural gas, small-head hydro, electric vehicles, smart grids, and many more.

We appreciate the opportunity to provide further input on the Proposition 39 Program Implementation Guidelines (dated November 2013). In addition to our previous set of comments, we provide the following recommendations for your consideration prior to adoption of the final guidelines.

Page 11: Energy-Related Training

AEE recommends adding clarifying language so that the description reads as follows:

“Energy efficiency training (including materials) of classified school employees, teachers and building occupants”

Page 12: Large Eligible Energy Project Reward Requirements

AEE recommends clarifying that LEAs receiving Tier 4 awards have the option to submit a separate energy expenditure plan for a large eligible energy project that includes up to four (4) school sites.

Page 19: Data Analytics

AEE continues to be very supportive of the California Energy Commission’s (Commission) efforts to require technical validation for data analytics solutions. It is critical, however, that the Commission

provide flexibility in the Prop 39 guidelines to ensure there is a competitive marketplace for LEAs as they consider no touch data analytics solutions, and likewise, that all qualified data analytics providers have a viable path to achieve acceptable technical validation. As mentioned in our previous comments, we recommend expanding the explicit language so that robust validation exercises such as technical reviews by a California utility as part of a competitive bid process, or U.S. federally-funded scaled comparison to on-site audits, are considered valid. This would leverage existing efforts while ensuring LEAs have access to high quality services.

Appendix Page E-2: Non-Energy Benefits

AEE believes the stated 3% adder does not represent the breadth of non-energy benefits that may be realized with each project. These advanced energy projects can result in many benefits including, but not limited to, reduced capital expenditures, reduced maintenance and repair budgets and improved operational efficiency. We recommend working with stakeholders to develop a more accurate equation for the non-energy benefits associated with these projects.

We thank you for your work and efforts to collect and incorporate stakeholder comments to date. We look forward to engaging further and are happy to provide additional comment and clarification as needed. Feel free to contact us at (415) 799-3718 with any questions.

Sincerely,



Amisha Rai
Director, State Policy



Steve Chadima
Senior Vice President, Communications and Director of California Initiatives

cc: Commissioner David Hochschild, California Energy Commission
Commissioner Karen Douglas, California Energy Commission
Commissioner Janea A. Scott, California Energy Commission
Rob Oglesby, Executive Director, California Energy Commission
Drew Bohan, Chief Deputy Director, California Energy Commission
Marcia Smith, California Energy Commission
The Honorable Kevin de León, California State Senate
The Honorable Nancy Skinner, California State Assembly
Cliff Rechtschaffen, Senior Advisor Office of the Governor

