Energy - Docket Optical System

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To: Energy - Docket Optical System

Cc: 'Aileen Dalen'; Anna Ferrera

Subject: Prop 39 13-CCEJA-01

Categories: Ready to Docket

California Energy Commission

DOCKETED

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TN 73829

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Hello,

There are two changes proposed in the recently released revisions to the Prop 39 Program Implementation Guidelines:

- 1. Change to SIR calculated across LEA: This change to allow the SIR to be calculated for one application across all school sites in an LEA is very helpful. It provides additional flexibility to LEA's without compromising the goals of the Prop 39 program.
- 2. Change of Project Cost Definition to not include Design: I see that "Design" was removed from the definition of Project Cost for the SIR calculation. This means that only the Construction costs are considered in the equation. However, this means that only the Construction Costs may be included in the funding request for each project as well. Design costs (and other project soft costs such as IOR, testing, construction management, etc.) are also not allowable Planning Funds Expenditures. Therefore it appears that these costs can not be funded by Prop 39 and LEA's must provide other funds to cover these costs on projects. Is this correct? If, so this may be problematic for some LEA's with limited or no facility funding.

Thank you,

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