

## Energy - Docket Optical System

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**From:** Steve Earl [searl@centurybuilders.net]  
**Sent:** Friday, October 24, 2014 11:20 AM  
**To:** Energy - Docket Optical System  
**Cc:** MaryAnn.Larrieu@ouhsd.k12.ca.us; Jennifer Baxter; Jennifer Carrell  
**Subject:** Docket 13-CCEJA-1 Comments on Proposition 39 Guidelines

California Energy Commission

**DOCKETED**

**13-CCEJA-01**

**TN 73858**

**OCT 24 2014**

Dear Energy Commission Members and Staff:

How does the California Energy Commission intend to address the issue of Local Educational Agencies with existing onsite renewable generation at all of their schools? As more schools install renewables, the question of how to fairly value subsequent energy efficiency measures will need to be addressed.

Proposition 39 Guidelines require LEA's to achieve a Savings-to-Investment ratio of 1.05 using annual billed electricity and consumption. Due to existing photovoltaic generation and an aggressive energy conservation program, many sites have electricity bills that reflect a net surplus generation of electricity on an annual basis. The Savings-to-Investment ratio of 1.05 is impossible to attain, with negative consumption numbers.

Schools should be applauded, not penalized for being early adopters of renewable technology. They have done more than their fair share of reducing demand to the grid. And they are providing living classrooms with curriculum for students to learn about career pathways through Green Technology Academies.

I strongly urge the California Energy Commission, as the lead agency in Proposition 39 implementation to work with Local Educational Agencies to approve alternate methods of calculating "cost effectiveness" so they may enjoy equal opportunity to this funding for badly needed upgrades to HVAC and lighting efficiency measures for their hard-working students and dedicated staff.

Sincerely,

**Steve Earl**

*Chief Operations Officer*



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