ADURA™
TECHNOLOGIES
28 Second Street, 4th Floor * San Francisco, CA 94105
Phone: +1 (415) 227-0868 * Fax: +1 (415) 227-0856

August 5, 2009

California Energy Commission
1516 9th Street
Sacramento, CA 95814

Subject: Preliminary SEP Guidelines

Dear Sir/Madam:

Adura Technologies is a wireless lighting controls company founded under the auspices of the California Energy Commission (CEC) Public Interest Energy Research (PIER) program and headquartered in San Francisco. We want to thank you for the opportunity to make a public inquiry into the State Energy Program Preliminary Guidelines and look forward to your further guidance later this month.

In brief, we have the following requests for clarification in the final guidelines and recommendations:

1) In the last paragraph on page 5, you state that the Energy Commission plans to fund additional SEP programs at a later date and then state definitively that the Energy Commission will enter into partnerships with other State agencies to fund energy efficiency programs. Was the second sentence meant to be a clarification of the first sentence or an example of the kind of program that you plan to fund at a later date?
2) In Section D.1.c, you state that the solicitations will state a minimum and maximum for individual funding awards. Is it possible that a corresponding application could be accepted but at a different funding level than requested in the application?
3) In Section E. Approval of Awards, will the members of the ARRA Committee be known to the public or knowable by means of a Freedom of Information Act request?
4) In Section M. Award Payments and Invoicing, we would like to recommend that the 10% retention be tied to a Certificate of Customer Acceptance for a specific project rather than the state of the overall award. The 10% retention actually ties up working capital at a time when capital is very expensive. It seems to go against the economic reasons for SEP.
5) In re "green jobs" programs, Adura Technologies is a manufacturing partner for a job training program for lighting controls that was originally sponsored by Southern California Edison. The California Advanced Lighting Control Training Program (CALTCP) was originally put together as a way of ensuring that union workers would correctly install and commission lighting control products. Because it originated prior to the recession, it is already in full swing without ARRA funding and will be rolling out to 23 NECA/IBEW journeyman and apprenticeship training centers as well as a larger number of community colleges. The preliminary guidelines give priority to job training/retraining programs, but at the very least, we believe we should get credit for this even though we don't believe it is funded by SEP. Furthermore, we believe that its origin should be taken into account with respect to matching funding since this will make more money available to project implementation and direct labor job creation.

6) We respectfully request that the Energy Commission be more explicit about who might be considered Program Administrators.
7) We respectfully request that the Energy Commission clarify the relative importance of cost-effectiveness versus job creation. Will there be specific targets for either of these or will they be compared across applications?

Thank you for the opportunity to contribute. We await your final guidelines.

Best regards,

Zachary M. Gentry
Chief Strategy Officer
Adura Technologies, Inc.