

## DOCKETED

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*Comment Received From: Ben Thompson*

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## **On Proposition 39 K-12 Guidelines**

*Additional submitted attachment is included below.*

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**From:** benthompson510@gmail.com on behalf of Ben Thompson <ben@peraltaenergy.com>  
**Sent:** Friday, May 06, 2016 9:04 AM  
**To:** Energy - Docket Optical System  
**Subject:** Comments on Proposition 39 K-12 Guidelines. docket number 13-CCEJA-01

My firm is providing energy management consulting services to several dozen public charter schools.

I read the draft revised Prop39 Guidelines. In the EUL appendix there is a notation for PV that says 25 yr EUL if PV panels have a 25 yr warranty.

I request a determination on the type of warranty.

If the requirement is for a 25 year performance warranty, then this is no problem. 25 year performance warranties are available from several manufacturers.

If the requirement is for a 25 year functional (aka 'product') warranty, then I have three schools (so far) that will be leaving hundreds of thousands of dollars on the table (they won't be able to spend their full allocations) because they get public power at \$0.14/kWh and the SIRs won't pencil out without a 25 year EUL for PV. (25 year PV panel product warranties have a large price premium).

I'd like to suggest that if CEC intends to require a 25 year product warranty on PV panels to get a 25 year EUL, then for consistency CEC should also require a 15 year product warranty on LED lighting in order to claim a 15 year EUL.

Thanks for your attention.

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Ben Thompson  
Energy Manager & Building Analyst  
Mobile: 510.459.0827  
[www.PeraltaEnergy.com](http://www.PeraltaEnergy.com)  
[ben@peraltaenergy.com](mailto:ben@peraltaenergy.com)  
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