

## DOCKETED

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*Comment Received From: Elisabeth Russell*

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**Support for a One Year Extension of the Proposition 39 Encumbrance Deadline**

*Additional submitted attachment is included below.*



December 14, 2016

The Honorable Andrew McAllister  
1516 9<sup>th</sup> Street  
Sacramento, CA 95814

Dear Commissioner McAllister,

On behalf of the AMBAG Energy Watch program, I am writing to request a one-year extension of the Proposition 39 K-12 encumbrance deadline, from June 30, 2018 to June 30, 2019.

The AMBAG Energy Watch program works with the school districts in our tri-county region to provide a full range of support in all phases of Prop 39 efforts, from initial audits and identification of potential projects, to development and submission of the Energy Expenditure Plan document, support with obtaining school board approval for the EEP, support with the preparation of the RFP, and support with the installations. AMBAG Energy Watch has submitted and had approved thirty-four Energy Expenditure Plans to date. Currently we have three additional plans submitted to the California Energy Commission that are under review, which we hope to receive approval for by the end of this month. We have an additional seventeen Energy Expenditure Plans that are under development and we anticipate submitting for approval in the first half of 2017. In total these plans represent 72% of the Prop 39 funding available to the school districts in the AMBAG region.

From a pragmatic, operations focused perspective; it just makes sense to provide this extension. There are many operational factors that come into play that each adds their own significant time impacts to this process. They include the following time factor impacts; the time factor for EEP review and approval by the CEC, the release of funds occurring only on a quarterly basis by CDE, the DSA review and approval process for the more complex projects, the school board RFP release and approval process, and finally, the fact that for the most part, energy efficiency installations must occur during the limited summer months because they can't impact the student population during the academic school year. All combined, these timeline impacts, in each of the diverse areas of responsibility, add a significant amount of time to the completion of a Prop 39 funded project. Despite implementing every project management action to be time effective, even the most efficiently managed project can take years to complete. An extension of this deadline is critical, especially given that the final Prop 39 fund allocations will not be made until the fourth quarter of 2017, leaving less than a year to encumber the funds, which is next to impossible given the time factors needed for a project to pass through the processing stages of each of the diverse areas of responsibility on the path to completion. AMBAG thanks the California Energy Commission for considering this request for an extension.

Respectfully submitted,

Elisabeth Bertrand Russell  
Special Projects Director  
AMBAG Energy Watch