

## DOCKETED

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*Comment Received From: Chris Ing*

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**Suggestions for Prop 39e-SB110 Program**

*Additional submitted attachment is included below.*



2/2/18

California Energy Commission  
1516 Ninth Street  
Sacramento, CA 95814

Subject: **Prop-39 – SB 110 and Charter Schools**

Dear California Energy Commission:

Thank you for the opportunity to provide input and commentary on Prop 39e - SB110 as we look toward the rollout of the new program. Our firm's extensive experience in working with charter schools statewide in the current Prop 39e program since 2013 has made it clear that charters have been – and will likely continue to be – underrepresented in securing this powerful funding stream. They already face a programmatic disadvantage as they must have completed at least one charter renewal in order to be eligible for the majority of their allocated funding. In addition for many, if not most, of the participating charter schools, their energy-improvement needs far exceed the average (Tier-2) \$250,000 per-school allocation. For these and other reasons, it is estimated charter schools collectively have left approximately \$100M in Prop 39e funding unsecured. It is our belief that these funds, having already been allocated to charter schools, should remain accessible only to charters in the new program rollout.

The language of SB-110 designates initial application criteria for the program, including a competitive bid solicitation. Such an approach presently does not favor charter schools because they will be at a competitive disadvantage to the built-in site-aggregation that large school districts can naturally accomplish using comparably vast internal resources. In order to ensure parity and equality in the program, we believe charter schools should be allowed to combine projects with other charter schools so that the aggregated projects may then be competitive with larger Districts.

We believe it is possible to level the playing field for charter schools in the scenario of a statewide competitive solicitation for the impending “second version” of Prop-39e. In order to do so, we suggest the following two pre-requisites be incorporated into the program by the California Energy Commission as it designs and approves the new structure in the coming weeks:

1. Ensure that the approx. \$100M that has been left un-used by charter schools in Prop-39e, will still be available to charter schools (and only charter schools) in the SB-110 Prop-39e rollout; and
2. Ensure the application and approval process for the new version of Prop 39e allows for aggregation of Charter projects Statewide in order to be competitive with larger Districts. This should be allowable without undo hardships such as requiring a JPA or similar structure.

Thank you for your assistance in ensuring equality for charter schools.

Respectfully yours,

A handwritten signature in blue ink, appearing to read "Chris Ing". The signature is stylized with a large loop and a horizontal stroke extending to the right.

Chris Ing  
Vice President