

## DOCKETED

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<b>Project Title:</b>	Prop 39 - California Clean Energy Jobs Act
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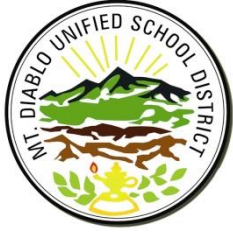
*Comment Received From: Mt. Diablo Unified School District*

*Submitted On: 4/12/2016*

*Docket Number: 13-CCEJA-01*

**On Docket No. 13-CCEJA-01**

*Additional submitted attachment is included below.*



Mt. Diablo Unified School District  
2010 Measure C  
3333 Ronald Way  
Concord, California 94519  
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March 29, 2016

Dr. Robert B. Weisenmiller  
California Energy Commission  
1516 Ninth Street, MS 4  
Sacramento, CA 95814

Subject: Docket # 13-CCEJA-01

Dear Dr. Weisenmiller:

I would like to begin by thanking California Energy Commission and its staff for work associated with the California Jobs Act of 2012. While the District may not agree with every determination, each of our inquiries has been met with a courteous and timely response.

That being stated, Mt. Diablo Unified School District (MDUSD) feels it necessary to reiterate to the Commission how we have taken a proactive approach in the push to save energy and provide for the health and comfort of students/staff. While the District's move to green technologies began much earlier and since 2010, MDUSD has installed photo-voltaic (PV) systems with a design production of 12 MW and recently completed installation of new Heat Pump, Variable Refrigerant Flow (VRF) technology, Air Conditioning and Heating (HVAC) systems at numerous sites. In addition to these important system elements, MDUSD recently replaced several inefficient classroom buildings with facilities that utilize the latest green technologies and strategies.

It is this strong commitment that has resulted in MDUSD falling into a gap within the current CEC program guidelines. A gap which leaves MDUSD feeling penalized for being proactive. A gap where existing evaluation criterion penalizes District's like MDUSD for existing on-site power production. While this gap is significant to MDUSD's on-going commitment to implement sound energy strategy, it is our opinion that it is not insurmountable. With the commission's assistance, a minor modification to current guideline language would remove the penalty and allow District's like MDUSD to further improve our existing facilities.

It is for this reason that MDUSD strongly requests your thoughtful consideration to close this gap with implementation of the following language:

**SIR Alternative for Zero Net Energy LEAs**

***If prior to December 19, 2013, each school site within an LEA had on-site generated power, the LEA may consider submitting an energy expenditure plan with eligible energy projects using an SIR alternative process described below.***

***An LEA shall submit a narrative describing the facility(ies) background(s), the clean energy generation project(s) and the energy saving information which demonstrates how the proposed eligible energy measures meet the Public Resources Code 26206(c) "All projects shall be cost effective: total benefits shall be greater than project costs over time." The LEA must describe its methodology for determining cost effectiveness and explain how it complies with this Public Resources Code section.***

With your approval of this minor change, an LEA could submit a package specific to their situation. Then CEC could then evaluate it on its own merit.

As a District, we feel the request is more than reasonable and well within the technical evaluation spirit of the California Jobs Act of 2012.

Sincerely,

Timothy M. Cody  
Director, Measure C

Cc: Dr. Nellie Meyer, MDUSD  
Wayne Oetken, MDUSD  
Chuck Shinneman, CECI  
Aaron Wintersmith, CECI