

DOCKETED

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May 23, 2016

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

RE: Proposition 39 Guidelines – docket: 13-CCEJA-01

Dear Commissioner Weisenmiller,

On behalf of the California Association of School Business Officials, which represents more than 3,000 school business officials statewide, we are writing to request consideration of a revision to the Proposition 39 Guidelines. As many small districts attempt to complete their Proposition 39 projects, they are facing a number of obstacles that primarily impact small or economically disadvantaged school districts. In particular, they do not have the required district funds to meet the Proposition 39 SIR requirements for HVAC projects. For many of these districts, replacement of HVAC equipment is an absolute necessity for continued school operation, not just a means to improve the energy efficiency of their buildings. Therefore, we are writing to request that the Commission consider the following alternative HVAC Effectiveness Methodology for Small or Economically Disadvantaged Districts:

"Alternative HVAC Cost Effectiveness Methodology for Small or Economically Disadvantaged Districts." Small or economically disadvantaged districts who need to replace old HVAC systems with new higher efficiency equipment, shall be allowed to qualify these measures for Proposition 39 funding by demonstrating that replacement of these systems will result in costs savings of at least 5 percent. "Small" district shall be defined as a district with an ADA of 1,000 or less. "Economically disadvantaged" to be defined as districts either having a Title I population (i.e., Free and Reduced Lunch Program eligible population) of 50% or greater, or, districts with a County Office of Education Certification financial status that is either "qualified" or "negative".

Thank you for your consideration and your efforts to support the energy needs of small and economically disadvantaged schools. If you have any questions, please feel free to contact me at sbachez@casbo.org.

Sincerely,

Assistant Executive Director, Governmental Relations
California Association of School Business Officials

cc: Commissioners
Elizabeth Shirakh