## DOCKETED

Docket Number:	18-MISC-02
<b>Project Title:</b>	Program Concept Workshop for Bus Replacement, ECAA-ED & Prop 39
TN #:	222407
<b>Document Title:</b>	Clay Ross Comments PROP 39
Description:	N/A
Filer:	System
Organization:	Clay Ross
Submitter Role:	Public
Submission Date:	2/1/2018 8:51:22 AM
Docketed Date:	2/1/2018

Comment Received From: Clay Ross Submitted On: 2/1/2018 Docket Number: 18-MISC-02

## **PROP 39**

I represent Columbia Elementary School District located in Redding, Ca. Our District operates two school sites with 4 schools, (Lion Cubs preschool. Columbia Elementary, Mountain View Middle and East Valley Community Day). Both school sites are 100% solar. Our Prob 39 allocation was slightly in excess of \$240,000. We submitted several applications for projects to leverage our Prop 39 dollars and increase our energy efficiency. We were denied several times and finally received authority to move forward on two small projects in the District which left approximately \$175,000 of Prop 39 funds that the District is eligible for but cannot spend.

An example of a scenario which was denied us is when we replaced 17 portable with inefficient HVAC, lighting, windows and insulation with brand new, permanent buildings we were informed that these were not like for like and therefore, not eligible. When in fact, in terms of CDE, DGS and OSPC, they deemed us eligible for modernization funding because we were replacing like for like. Hopefully you can see that the inconsistency of state programs can be frustrating to Districts.

We support the Clean bus program. We applied for replacement of 4 of our buses and each of our separate applications came in the top 100, but we are none-the-less on the wait list. We can introduce these buses into our fleet immediately upon the installation of the charging units and will be able to utilize the power of the sun to facilitate the charging of these vehicles which will further reduce the energy footprint of this program.

CESD is also faced with a dramatic increase in utility costs from our City managed utility. Providing access to these funds will enable us to replace many of our 17 year old HVAC systems that are far less energy efficient than the ones being manufactured today. This alone would benefit not only the District but the demand for energy across our city, county and state. Even though our middle school site is nearly 100% solar, we only pay roughly \$3,000 for our energy in a given year, the proposed impact of the new rate structure increases our rate to \$31,000 per year due to peak demand.

Lastly, in preparation of our plans for submital, we went through at least 3 different vendors, paid each of them preparation fees and when we finally received approval on our final submittal, needed to expend more funds for the amount of time the vendor spent on getting the plan approved. I realize that this cost was borne by our Prop 39 allocation, but what a waste of money in my opinion due to the red tape associated with access to these funds.

Columbia Elementary School District is in favor of the continuance of the program and to find a plan for the expense and allocation of the remaining money in the fund. However, we feel strongly that in moving forward, only those LEA's that have submitted plans, whether approved or denied, be eligible for the continuance of the program prior to enabling Districts that never even applied for any of the programs to submit applications. Additionally, we are in favor of loosening the strict guidelines of the program especially for solar customers. We feel that we can meet the components and intent of the legislation, to save energy and create jobs in doing so. To this point, CESD, and other solar Districts and/or schools have been penalized for being proactive prior to this voter approved legislation to reduce their energy demand by not being considered eligible for ways to save even more energy.