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| Docket Number: | 18-IEPR-07 |
| Project Title: | Doubling Energy Efficiency Savings |
| TN #: | 223906 |
| Document Title: | Alice Sung Comments Support for EE in K-12 public sector |
| Description: | N/A |
| Filer: | System |
| Organization: | Alice Sung |
| Submitter Role: | Public |
| Submission Date: | 6/21/2018 4:53:35 PM |
| Docketed Date: | 6/21/2018 |

Comment Received From: Alice Sung
Submitted On: 6/21/2018
Docket Number: 18-IEPR-07

Support for EE in K-12 public sector

Additional submitted attachment is included below.

June 20, 2018

To: California Energy Commission (CEC)

From: A. Sung

RE: Comment in Support of Doubling EE to Deep Energy Retrofit to ZNE of CA Public K-12 sector, CEC docket 18-IEPR-07

In reviewing the outline format of the current “Draft Outline 2019 Statewide Energy Efficiency Savings Action Plan,” and as comment to the CEC Docket 18-IEPR-07, Energy Efficiency, from the perspective of a practitioner, it appears both the EE Savings Action Plan and the IEPR may have gaps in fully addressing what is lumped together as “the Public Sector.” Especially when it comes to the EXISTING buildings in California, the State (CEC and CPUC + others such as OPR and SGC) should take a hard assessment of exactly what this “Public Sector” consists of. One will find it can be broken down into almost all of the so-called “sectors”—namely – residential, commercial (or NON-Residential) possibly some agriculture and even some industrial (where do municipal utilities fit?) Furthermore, from a sheer scale standpoint, perhaps the more easily effective focus for these EE programs should be the public education sector--- from pre-k , to k-12 to higher education.

Note that currently, the state and IOUs’ point to the Bright Schools Program and or the Proposition 39 program as taking care of the K-12 sector. While the Bright Schools program offers free energy audits perhaps coupled with follow up “technical assistance advisement “ on what measures to implement from the audit reports, to a handful of individual schools sites, it does not constitute a comprehensive EE program that serves the need of all 1000+ school districts, let alone, the tens of thousand individual school sites. Proposition 39 was well –intentioned, with arguably both good and bad aspects, and with some success (final results have yet to come in;) however, NEWS FLASH-- funding has not been renewed for Prop. 39, and the program’s future cannot be counted on. Without being able to point to Bright Schools or even Prop. 39, the litmus test will be--- what of the IEPR and Action Plan adequately addresses the substantial and particular needs of the public K-12 education sector? Past funding over the last 5 years of the program , although substantial, is still a drop in the bucket to address the scale of the needs in the public K-12 sector to address “doubling of energy efficiency” , let alone ZNE goals of the State.

I urge the State , CEC, CPUC to partner with other agencies and branches of government of the State to prioritize a focus on the K-12 education sector in its Energy Efficiency Action Plan, and to address the needs of ALL the “Public Sectors.” Thank you.