STATE OF CALIFORNIA – THE RESOURCES AGENCY
BEFORE THE
CALIFORNIA ENERGY COMMISSION (CEC)

In the matter of,	)
	) Docket No.
Proposition 39:	) 13-CCEJA-1
California Clean Energy Jobs	)
Act	)

Proposition 39 Webinar:

2013 Program Implementation Draft Guidelines

Wednesday, October 9, 2013

9:00 A.M.

APPEARANCES

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P R O C E E D I N G S

OCTOBER 9, 2013 9:00 A.M.

UNIDENTIFIED SPEAKER: Okay good morning, this is the California Energy Commission and we are about to start our webinar today on Proposition 39 Draft Guidelines.

And I'd requested, before we start, again if you'd just joined, please mute yourself on your end so that we can avoid feedback at this presentation. Thank you.

MS. SHIRAKH: Okay, hello everyone. My name is Liz Shirakh and I'll be presenting the Prop 39 Draft Guidelines today in this webinar. And I thank all of you for taking time out of your day to make public comment on these important guidelines.

I'd like to remind all the listeners that this will be recorded. The purpose of this meeting is to share the guidelines. Public comments and questions, we will be doing that at the end of my presentation of the guidelines.

So, we're still kind of getting all of the numbers from our end so it will become a clearer presentation for everyone.

So, I'm getting a little bit of feedback again. So, if you are listening, if you can mute your phone so it makes a clear connection for everyone.

Okay, the slides are a presentation of the draft guidelines, so a few of you, you might know this information because you have read the guidelines. For others, this will be their first look at the guidelines and it is a --

(Operator Interruption)

PAT: Okay, we're still hearing folks on the line. If I can ask everyone to please mute your lines, otherwise we hear competitive conversations.

So, I'm going to wait until the line is clear before we continue. Sorry about this, folks, but we've got a lot of folks on the line.

UNIDENTIFIED SPEAKER: We strongly recommend you mute all of us except the presenter (inaudible) --

PAT: Yes, that's what we're attempting to do.

Okay, so as I said the purpose of this meeting is to collect comments. So, we encourage comments, suggestions, questions. These draft guidelines, we have a public comment period until October 25th in preparation for the final draft guidelines to be considered at a December 19th business meeting.

(Off-record conversation)

PAT: So, just an overview of today's presentation, I'll give you a quick summary of the

California Clean Energy Jobs Act, which is the Prop 39. I'll talk a little bit about the elements of the program.

The majority of my presentation will be an overview of the guidelines that --

(Operator Interruption)

PAT: Got it. Okay, one more time, I'm just asking if everyone that's listening, there's a lot of callers coming in, if you would put your phone on mute -- we're trying to mute you all from this end but it's a manual process and with over 200 callers it takes a while to go through the list.

So, again, if you could mute on your end that's great, we appreciate it. As soon as we get that, I'll continue.

And we'll have our questions, comments at the end and then a wrap-up. But just a quick overview of this.

Okay, California Clean Energy Jobs Act is really a (inaudible) of two recent acts, Proposition 39, which is the California Clean Energy Jobs Act and Senate Bill 73, which was the enacting legislation.

The purpose of the -- we're getting feedback. I think as we get into the presentation it might be a little bumpy getting everyone on mute, so I really appreciate all your patience.

The objective is to create good paying energy efficiencies and clean energy jobs in California, energy-efficiency programs and to find accountability of the money that's being appropriated.

The majority of the guidelines that I'm going to be going over, our requirement is to fund these two laws. And the Energy Commission recognizes that there is a delicate balance between meeting the requirements of these laws, for example full public accountability and energy savings by projects, and we also recognize a need to make this program a program that LEAs, school districts, schools, county office of education, so schools can fully participate in and that these funds go to those, the much-needed energy projects.

So, it is a balancing act putting this program together.

Go to the next slide. So, the elements of the program, $428 million, of course, for LEAs and community colleges for retrofitting energy projects, and energy savings, and job creation.

Eighty-nine percent will go to community college districts, county off of education from charter schools. That's $281 million for this fiscal year, 2013-14.

And 11 percent will go to --

(Interruption)

PAT: Okay, sorry about that. We're having a little cooking lesson in the middle of that.

So, 11 percent will go to the community college districts, which is $47 million. And for this (inaudible) that's a separate program that really won't be pertinent to go into too much detail on.

The next slide, please. So, the California Energy Commission also is getting $28 million for our ECCA Loan Program, which provides low-interest -- or no-interest loans in this case or technical assistance.

And also, $3 million was allocated to the California Workforce Investment Board for a competitive grant program.

And, finally, $5 million was appropriated through the Budget Act of 2013-14 to the California Conservation Corps for programs for youth.

Okay, so now we'll start going into the draft guidelines. It's basically divided into three chapters. The first chapter is background information. The second chapter is really the substance of the K-12 Program, and the third chapter is a brief overview of the other elements of the program, like the ECCA Program, the California Conservation Corps and the Workforce Development Program.

And, finally, there’s an appendix that has a lot of detailed information and that is referenced throughout the document.

So, we’ll start with the Chapter 1: Background Information. This section is on page 1 through 4. I’m not going to go into a lot of details on this as far as background information, on the allocations, an overview of the guidelines, funding distributions, and some confidentiality, effective date, and changes to the guidelines.

I think one thing I would like to point out, again, is the effective date of these guidelines will be the date that they are approved at a California Energy Commission Business meeting and right now that is scheduled for December 19th.

Moving on to the next slide, Chapter 2, so this starts on page 5, and first of all we’ll talk about the eligibility.

So, this program is for LEAs and which are county offices of education, school districts, charter schools, and state special schools.

And this is for public buildings that pay their own utility bills based on a meter.

For leased facilities, because some of the LEAs in California are in leased facilities, it gets a little bit more detailed and complicated.

So, in these bullets here you'll see that in a privately-owned leased facility the LEA's eligible if they pay their own utility bill, have a separate utility meter for the building, and the landlord has then written approval to do the energy work.

The next slide, please. Continuing on the eligibility of the leased facilities, in a public-owned leased facility, with a separate meter, an LEA would be eligible. And this would be a situation where it's owned by another LEA and there's a lease agreement between the two LEAs.

So, in that particular situation they would -- an LEA would be eligible to participate in this program.

And the third situation is an LEA that's in a publicly-owned leased facility without a separate meter. For those folks, they will be eligible for the program if it's owned by another LEA, the lease agreement is between the two of them.

And so the two LEAs would have to submit a joint request for planning dollars and for expenditure plan and I'll go into more details on what that is.

But, basically, it would need to be a joint application.

This particular part of the eligibility

requirements, when we're talking about these facilities, can get a little complicated. The purpose of this workshop today or this meeting is to go through the guidelines and to have comments.

So, if you have specific comments on eligibility and project information, this is probably not the venue to ask those specific questions. But it's real important that folks know that there are some requirements regarding these facilities.

Okay, so next, this would be on page 7 of the guidelines, and I think I might have us flip over to the actual guidelines, if we can go to page 7, and that way I can show a table that talks about or has a nice visual of -- there we go -- the tiers.

So the way the statute reads is it's basically set into four tiers, the allocations. So, for Tier 1, this is an LEA with an ADA of 100 or less we have a minimum of $15,000 plus a free and reduced price meal adder.

Then LEAs with 101 to 1,000 have a minimum of $50,000, plus the free and reduced meal adder.

The third tier is ADA 100 -- I mean 1,001 to 1,999 and that is a minimum allocation or award of $100,000 plus the free and reduced meal adder.

And then, finally, we have Tier 4, which is the larger organizations that would have an ADA, or average daily attendance, of over 2,000. And then, again, plus the free and reduced lunch adder.

We'll go back to the presentation, all right, and -- okay, there we go, thank you.

So, the first option that has been advertised has been this two-year concentration of award option. In August this year LEAs were notified that they could choose to combine the first year and second year award, if you were a Tier 1 and Tier 2, and have that allocation this year.

This will be offered next year as well, in September. So, if an LEA was not able to take -- submit that choice this year, they'd have that for year two and year three.

I should mention this is a five-year program. It's really five one-year programs because each year the allocations will be determined and will be different, but this is a five-year program.

The next option for LEAs in considering this program is the energy planning reservation. And that is on page 8 through 10, if you're going on with your guidelines. And this has -- we've recently modified the language in the guideline, because when we were looking at the final awards this wasn't a blending of the tiers and it was more easily understood by looking at an award amount versus a tier.

These planning reservations option will be available very soon. In the guidelines it says “now” because when we were writing them we thought this would come out at the same time.

But the California Department of Education will be releasing the final award allocation numbers either late this week or next week for LEAs. And with that release of the award amount you’ll have the opportunity to request energy planning reservation money now, and that will be a simple online request through CDE.

So, there are some funding limits, though, that go with that, and this also will only be available this first year. The energy planning dollars you request in your first-year allocation you can use throughout the whole five-year program.

But having this option available for planning dollars won’t be an option for years two through five.

So, regarding these funding limits, if your first year allocation is $433,000 or less you may request up to $130,000 of your first-year award for planning dollars.

If your award is greater than $433,001, then you may request 30 percent of your award up to $1 million.

There’s also some criteria for how that money is spent and what planning dollars mean.

Again on pages, I believe it’s 9, there is a table that goes into more detail. But the planning dollars are basically using for screening and energy audits, the project identification -- also for a project identification through data analytics.

And we have set an 85 percent mark. So, 85 percent of your planning dollars can be used for those activities.

The remaining 15 percent can be used for Prop 39 Program assistance. So that will be activities that can be completing the paperwork involved with the program, which is an expenditure plan, and the backup material that goes with that, getting the utility data release forms from your utility company, completing the benchmarking requirements. Any of those type of activities that are assigned with participating in this program.

Okay, we’re going to wait until we get --

Okay, so moving on to the next slide, continuing as we walk through the guidelines, on page 12 it talks about training costs.

So, this program does allow funding to be requested for training of staff for energy-related activities. We're allowing up to 2 percent of the award or $1,000, whichever is greater.

And also, there is an opportunity to request funding for an energy manager, where we have currently 10 percent of your yearly allocation or up to $100,000 can be requested through the expenditure plan for an energy manager.

Now, some LEAs may have a lower allocation amount and so we encourage LEAs to consider pooling their funding and jointly hiring an energy manager that can be shared by multiple LEAs. So, that's just an option that is available.

Okay, so we'll continue to the next slide. And this section starts on page 12 and it's really an 8-step process to request funding or to participate in the program, not necessarily to request the funding.

Again, much of these requirements are in statute. And as you're looking at the guidelines, we've put the requirements of the statute on Public Resource Code in a gray box at the beginning of a section, so it's really clear on what is required by law.

Pointing out the first step on page 12, and that is to provide a signed release form from your utility company that provides the Energy Commission access to your utility billing data 12 months prior, and also for future data.

And that release form will need to be part of your expenditure plan. That's something that you can work on now.

Each reporting company has their own unique release forms so there is not a standard form that the Energy Commission can provide LEAs.

We will be posting more information about that on our website as the program develops.

Step 2 is benchmarking. This is a requirement of the program and what benchmarking is, is it basically determines an energy use index. So, this is two measurements of your energy usage.

And for folks that aren't in the energy world this might sound confusing, but it's really pretty -- it's not that difficult. In fact, we have some helpful steps to performing benchmarking in the appendix, in Exhibit D, on page 45 and 46.

And we're basically looking for two indexes. Basically, your energy costs, your 12 months' of energy costs divided by your square footage, and 1,000 btus per square footage.

We have included all the formulas to do that and, again, this is something that schools easily can do by themselves with following the guidance we have on pages 45 and 46.

And I'd also like to point out that this is -- we encourage you to benchmark all your facilities because it's an excellent way of comparing where you will get your most bang for the buck in investing in energy efficiency. But it's really only a requirement for the schools and the facilities that will be having Prop 39 dollars invested in them.

So, we'll go on to the next. So, Step 3 is prioritizing -- project prioritization consideration. And these are 11 factors that have been identified in statute. And you'll see them on the gray box on page 14.

So, some of these factors have been kind of built in to the program, 4 through 7 are pretty much built in. Like, for example, number 5 is benchmarking. And for 6 and 7 are really part of your cost-effectiveness calculation.

But we really -- this is a requirement that you look at these 11 considerations and in the expenditure plan there will be certification that those have been considered.

Again, this is a requirement of the statute.

Another requirement, as you are identifying potential projects is the sequencing of facility improvements.

This section is on page 15. And as you're looking at how -- what projects you should be targeting, it's suggested that you look at energy efficiency first, then next looking at on-site generation, and finally you considering nonrenewable projects such as, you know, gas fuel cells.

Secondly in this section we have, in Exhibit B, on pages 36 through 42, a typically cost-effective K-12 energy project. And there is a sample of this on the guidelines, on page 17.

But maybe, let's see -- I'll just quickly talk about that Exhibit B. It's a listing of projects that's organized by project category. So, for example, the first one you see is lighting. Then there is columns on the left-hand side, there's numbers 1, 2, 3, 4 and some situations, then there's the name of the type of energy project.

And then on the far right it indicates whether there is a calculator available for that particular project or if it would be an energy audit-required. I'll talk more about that later.

Again, these are projects that we have seen through our Bright School Program. These are typical projects. This is not -- every school is different.

But at least it gives you an idea of the types of projects that you might want to consider as you're choosing how this funding will improve your facilities as far as energy goes.

So, moving to the next slide, Step 5, and this section is on page 17 and 18. This requirement is actually three options for actually identifying your projects.

So, for simple projects, for example action one, there may be just an energy survey that is done, a walkthrough.

And to determine your savings of a particular project that's where that Exhibit B, as I just mentioned, can be helpful because the Energy Commission intends to have energy savings calculators available as a Prop 39 tool on our website. These are being developed and will be available in December.

And that will be an easy way for LEAs to calculate the estimated energy savings of a project. So, that's what -- an easy way of determining those energy savings.

Another way an LEA has to determine energy savings and project economics is option 2, which is an ASHRAE 2 Level audit. And these would be for more complex projects and may need a contractor, or utility provider, or an energy manager to actually do that analysis for you.

And the third option are other tools, such as data analytics, which is a no-touch or virtual audit that can guide you in directions that would indicated a potential project, and/or potential areas that might need an ASHRAE 2 Level audit.

So, again, we’re trying to lay out options, not mandate a specific requirement or method of identifying your energy project savings and analysis.

We’ll move on to Step 6. This is a cost-effectiveness determination. This is required in statute. And we have identified the savings to investment ratio, and this is basically net present value savings, your savings over the project cost.

In the appendix there is some detailed information on how that is actually determined. It’s in Appendix E.

We will also -- the Energy Commission will also have SIR calculators available online that you would put in five or six data points, and that will then calculate your SIR. We have an SIR for 1.05 so, basically, for every dollar you invest you should get $1.05 in return.

And that is the cost-effectiveness determination that needs to be -- it’s one of the criteria for an eligibility of a project.

Step 7 starts on page 20 and that is the actually submission of your energy expenditure plan. The first part, on page 20, talks about how often you can submit an expenditure plan. So, here we have for LEAs that are getting less than $50,000 you have three options. You can submit a yearly expenditure plan.

If you are one of those LEAs that requested funded your first and second year together, you could submit a plan that has those two years' funding together.

Or we heard that a lot of LEAs would like to have the option of submitting a five-year plan that would cover their estimated future allocations from this program and have a five-year plan laid out.

So, those three options are available for LEA's with less than $50,000 allocation for the first year.

The folks that fall into the other category -- if you can please double check your phones, okay.

You may have an option of submitting expenditure plans up to four times a year. We realize that these will be larger allocations. They may need to be broken up in pieces.

You still have the options of having that one year, bundled year. Really, the other option probably is not available to you, that five-year plan, because it just would be so large. But we're basically having that flexibility where you could submit one plan or up to three -- up to four plans per year.

So, moving to the next slide, so that's kind of how often you can submit. This next slide discusses the energy expenditure plan.

We will not have these forms available in the final guidelines, but they will be out and available just as soon as the guidelines are approved.

And basically this -- this is kind of the categories of information that will be in the expenditure plan.

There will be an area where you -- so, if you have requested energy planning funds, we will have a section -- (inaudible) -- the expenses plans, how you expense those kind of (inaudible) -- completing that section.

We'll ask for (inaudible) -- from Step 2 that I talked about.

The third is the actual project upgrades, the pre-installation verification form. You have the project description, the energy savings, the details of the project.

Fourth is for those of you who request training funds, we'll have a box for you to do that on this expenditure plan. Just like the next check for energy manager, you can request that through the energy expenditure plan.

The statute also requires that you have some job creation benefits estimates for your projects and we will have calculators, and then methodology available to make that determination. That is also in the guidelines, as far as the methodology.

Step 1 that we talked about is utility release data information is required, like we need to see that consent from your utility provider.

And finally, there will be some certifications that will need to be signed for various programs.

So, those are the major elements of the program. Probably the first, so let's say actually the pre-installation verification form is, again, the meat of where the project proposal is.

Now, we'll continue to the next slide. Okay, so once the expenditure plan is received here at the Commission we will be reviewing it for completeness, whether the projects are eligible, looking at the energy savings and the FRRs, and the technical and financial reasonability of the projects.

Once the expenditure plan is approved, the

Energy Commission will notify both California Department of Education and the LEA that the expenditure plan was approved. CDE will be “batching” those approved expenditure plans and processing them quarterly. But you would know ahead of time, through notification at the Energy Commission, that your plan was approved.

There is also information in the guidelines that talk about if your plan is disapproved and then the appeal process.

I’d just to like to stress that we, you know, intend to work with LEAs if there is an issue with an expenditure plan. We would be contacting you and trying to work that out with you before you just blindly received a disapproval type of notification. That’s our typical process in other programs that we work directly with the applicant and try to work those out.

So, moving on to the next slide, Step 8, and this talks about the tracking and reporting responsibilities that are a requirement of the program.

We’ll have a simple quarterly online report that will be a requirement and as you are implementing your project that will need to be submitted to us. It will just kind of give us an idea of where you’re at and if there are any bumps in your project.

Final reports, there are seven elements which are required by statute to be submitted and those are all listed on page 25.

And, finally, there are -- we need to see energy savings. And the energy savings have two -- we will see -- requesting that we see the energy savings, so that's going to be your total energy use 12-month summary prior to the project installation, and then the 12-month summary of energy usage after the project is complete.

The final report will be by expenditure plan. So, if you had 20 projects on your expenditure plan, once that final project is complete that would trigger the final report. You would wait 12 months after that because we want to see 12 months of energy savings, and that's when you would be submitting the final report.

And then job creation calculation is a part of that, as well.

All right, following the flow of the guidelines, there's an audit section on page 27, and again just to make sure it's clear, all projects are subject to audit. And CDE will usually correct any noncompliance expenditures through this program.

The next slide, please. The final part of this sector is the -- if there are expenditure plan changes, we have a list of those on page 27, I think they're actually on 28. There are several bullets that would trigger a change of scope or a change of plan where the LEA would need to notify the Energy Commission.

For example, if a project just, you know, set your originally work-through report, and this isn't going to work out, you know, once you have your bids, they're too high, or for some reason you don't want to do it and you would rather put your allocation towards some other projects, and that would be a trigger that would require an expenditure plan to be resubmitted.

But that's just kind of what are some of those triggers.

On page 28, we do recognize that there are DSA requirements in compliance. And those are just the set there.

We do recognize that DSA has, you know, methods in place and we now are working with them to make sure that these, I guess, are expedited. And this is to let folks know that the Energy Commission and DSA are working together on this.

Contracts are discussed on page 29. The guidelines to refer to the LEA's own procurement regulations and procedures, as long as they reflect applicable State law and local laws, and are not in conflict with the minimum standards that are in our guidelines.

And the standards that are in the guidelines are all required by statute. And I'd just like to point out the third bullet there because it is a requirement of SB 73, and it says, "LEAs shall not use a sole-source process to award grant proceeds."

So, just want to make sure that that is understood that that is a requirement of SB 73 and you would have to review with your local procurement or your own procurement regulations on how that relates.

Moving to the next slide, so Chapter 3, this is the final chapter. And this first page, on page 30, it talks about the California Energy Commission's ECAA Loan Program.

As I mentioned earlier, we have $28 million that's been appropriated to our ECAA Program. That provides no-interest loans and provides some technical assistance through our Bright School Program. This will be technical assistance.

The ECAA Loan will be available soon. We have to provide a notice for that.

The technical assistance is available now and that's up to $20,000 of free technical assistance to help identify projects.

So, for LEAs that are listening in right now I'd encourage you to consider that as a possible way of helping you identify projects through that resource here at the Commission.

Another -- moving on to page 32, the other -- there are similar programs. Yeah, the California Workforce Investment Board has a grant program. They were appropriated $3 million. And the details of this program is still under development.

But they will be putting together a competitive grant program for “learn-and-earn” job training and placement, and targeting disadvantaged job seekers.

And the next slide is the California Conservation Corps, through the Budget Bill 2013-2014 they were appropriated $5 million.

And again, they are also putting together and developing a program for their Corps members, and these are youth 18 to 25, who will be able to do some types of energy surveys, and data collection, and some basic energy-efficiency measurement type activities.

And finally, going through, we have the appendix. I’ve talked a little bit about, referenced different sections.

I’d just like to highlight our Exhibit A is kind of a visual presentation of the allocation of all of the Prop 39 money.

I talked a little bit about Exhibit B which is the typical cost-effective projects.

Exhibit C is a visual pathway of the eight steps that I walked through. Many of these eight steps -- or all of these eight steps are required by everyone, but there are certain options you can take within those steps to make it easier.

For example, doing an energy survey and using our calculator for simple project identification.

And so that's just kind of a visual pathway, that Exhibit C.

And then Exhibit D we have the benchmarking process.

Exhibit E we have details of how to calculate your SIR. Really, what are the calculations behind that?

And Exhibit F has the effective use for life, various measures, and that information is used in our calculators.

Job creation benefits calculation is in there.

And then, finally, we have the definitions and lots of acronyms for folks that, you know, if you see an acronym, an acronym in the guidelines you can refer back to that. What the heck does that mean?

So, that concludes my walk through of the guidelines. I'd just like to briefly, again, review our summary of our schedule and then we can go into some questions and answers.

Again, those guidelines were posted on the 27th and we're holding a series of public meetings. I think we have five meetings and three webinars, like the one you're participating in today, through October 22nd.

We'd like or we need to have all comments received by October 25th. And then in November we'll have the posting of the final guidelines in anticipating with considering going to the December 19th Business meeting.

And once the guidelines are approved we will begin implementing the program and expecting expenditure plans.

So, that's the schedule. So, moving to the next slide, we will -- again, you know, the purpose of this is to gather questions and hopefully provide some answers, get comments.

Again, this is recorded so we will have that available to go back on.

We plan to post some frequently asked questions and answers on our website as we gather all of these comments. And, obviously, they will be considered in our final draft of the guidelines.

Oh, yeah, the Power Point that you see today is going to be posted on our website. It’s the Commission’s website and our Prop 39 webpage.

I’d also -- if we can go to the next slide -- like to encourage folks, if you want, you know, obviously you can ask questions through today’s forum. But, also, we have available through our docket process, if you can e-mail us your questions, comments to docket at energy.ca.gov, and in the subject line put “Docket No. 13-CCEJA-1”, and also include “comments on Prop 39” that will ensure that we have received your question and your comment. And again, we need to have all of those by the close of business on the 25th of October.

So, yeah, I think we’re ready to do that.

MS. COLLOPY: Okay, so we are going to -- and this is Christine Collopy, with the Efficiency Division, and I’m working with those on this project.

The way we’re going to do question and answer, because I have all of you on mute, is I’m first going to take the questions that have people have typed into the chat box. That’s going to be the most efficient way for you to have your questions answered.

So, if you’re sitting at your computer and you’re on the WebEx, pull down your top menu and there will be a chat function. You can type your question in there and we're going to read them aloud, and then we're going to answer them.

Alternatively, you can raise your hand, through the "raise-your-hand" feature on WebEx.

We will be able to identify you. We can unmute you and then you could ask your questions aloud.

So, we will take the chat questions first and Liz will provide the response. Bear with me one minute, okay.

Okay, so the first question is from Bruce Blocks (phonetic). The question is "What if a charter school pays the utilities as part of the lease agreement as opposed to pay the utility bill directly are they eligible?"

MS. SHIRAKH: Good question. I think there's plenty -- these facilities have been the most problematic part of doing this. I believe that you need to pay it directly because we -- the part of their lease agreement we cannot -- we don't know what that bill is. And it might -- you know, they might want to work out some deal with their landlord where they separate that so we can see the actual utility billing data, or the actual bill, because they need to be responsible for that bill.

So, at this point I would encourage them to try to separate that so it wasn't just a, you know, fixed part of their monthly lease.

MS. COLLOPY: The next question is from Alice Fong (phonetic). "When will be announced of the award for each LEA be announced? It was supposed to be in September."

MS. SHIRAKH: Yes, as I mentioned in the beginning, those allocation amounts should come out very soon from CDE, as early as this week. I should probably say next week so I'm not -- but very soon. You're right, it did say September, but those will be announced in October. Then in October we'll have an open period for the LEAs to submit for planning funds. Those planning funds then will be -- a check will be released in November through the Controller's Office. And I believe in January CDE will have another open time, month so LEAs can request planning funds again in January.

And then later on in the spring of 2014 there may be a third period, an open period for requesting planning funds.

MS. COLLOPY: The next is a comment from Irma Forbath (phonetic). "Southern California Edison offers benchmarking classes at NEPA (phonetic)"

So, the next question is from Alice Fong. "May we bundle some of the projects examples that are listed in application B altogether in one EE project?" Or is that Appendix B?

MS. SHIRAKH: Probably Appendix. So, we'd like -- so, it will be more clear when you see the appliance forms that we need to see the projects listed individually. But they will be considered -- you will bundle all of those to get your SIR.

So, for example, if you have a project that doesn't meet the 1.05 SIR requirements, if you have that bundled in with a group of projects, you know, have higher ones as long as that average meets 1.05. I hope that answers your question.

MS. COLLOPY: A follow-up to that question, from Alice is "In the bundling are they limited to a single site or may the bundle, lighting retrofit for example, over multiple sites be allowed?

MS. SHIRAKH: Okay, we are -- we do recognize that it's very common to have a technology project by multiple sites. So, you might have a lighting project that's going over three schools.

Because we need to document, for this program, energy savings, we are requesting that you're going to have to break that out as school or site. So, they will have to break that lighting technology project out by site even though, you know, that technology may be installed at multiple sites.

MS. COLLOPY: The next question is from Anna Ampostat (phonetic). “We have replaced boilers only to have a really cold winter and show now gas savings. How will that be handled? The same with lighting retrofit but the site added a computer lab.”

(Operator Interruption)

MS. SHIRAKH: Okay, so I think the gist of the question is you can do an energy-efficiency project but due to weather conditions, due to change in the use of your building, you know, you might expand a computer lab as mentioned here. If you’re looking at that gross energy usage, you might not see the savings.

That’s why we’ve build into the program two ways of looking at energy savings. We will look at that gross campus-wide energy use, but we also are asking for estimated energy savings once the project is complete by, you know, by the project.

Again, that can be done if you’re getting the -- there’s four options listed in the guidelines. If you are having facility intensive as part of that, the documentation packets for that can be used to show it. If it’s a simple energy project, you can just use our calculators with the actual numbers being put back into that calculator for the estimated savings.

So, I'm hoping that answers your question.

MS. COLLOPY: The next question is related to the actual guidelines. "Will there be any last opportunity for public input on the next draft which is being posted in November?"

MS. SHIRAKH: The public input period is now through October 5th. So, once we've collected this, go through this process, no. Once we have the final posting in mid-November, there will not be another opportunity for public comment.

MS. COLLOPY: The next question is if the slides that are being used today during the webinar will be made available to the public?

MS. SHIRAKH: And, yes, they will be on the Energy Commission's website, under the Prop 39 webpage.

MS. COLLOPY: A question from Jennifer Morris (phonetic). "In the Governor's Guidance Document that CEC put out in May, there were IOU program and technical resources in the appendix. Could these be added to the guidance under additional resources?"

MS. SHIRAKH: We are -- we anticipate that we will have a handbook that will accompany these guidelines and in the handbook we would have similar resources that you saw in the CDE's draft guidance.

Okay, yes, there are a lot of useful tools and resources that were identified in that and there are additional tools that the Energy Commission is developing, as well as just general good information about how to go through this process.

So, we do anticipate having an accompanying handbook.

MS. COLLOPY: The next question is from Marty McGillis (phonetic). "You mention that energy savings will be verified by 12 months of pre-project energy data and 12 months of post-project data. How will you account for other changes in the facility, projects not included under Prop 39 funds, weather variations, changes in attendance, et cetera?"

MS. SHIRAKH: I think that's very similar to a question I answered a few minutes ago about the fact that there's two methods that the guidelines request energy savings to be provided.

MS. COLLOPY: The next question is will you be posting an editable form for our use? For example, benchmarking report, project prioritization and cost-effectiveness determination?"

MS. SHIRAKH: At this point we are definitely putting -- developing cost-effective determination calculators and tools, and that would be in the form of a form and, you know, we're still trying to determine exactly what -- whether it would be an Excel spread sheet or some kind of online form.

Good suggestions with the others and that's the purpose of this meeting is to get other ideas. So, we'll take that into consideration for benchmarking and other parts of the program.

MS. COLLOPY: The next question is; "Would the retroactive limitation prohibit an LEA from implementing a qualified energy project through a properly authorized change order to a contract which was entered into prior to the guidelines being approved?"

MS. SHIRAKH: I'm sorry, can I have you read that again?

MS. COLLOPY: "Would the retroactive limitation prohibit an LEA from implementing a qualified energy project through a properly authorized change order to a contract which was entered into prior to the guidelines being approved?"

MS. SHIRAKH: I'm sorry. So, retroactive limitations, so as far as a project goes, a project cannot -- Prop 39 dollars cannot pay for a project that happened prior to the guidelines being approved, so that would be December 19th.

Regarding planning dollars it's a bit different.

The retroactive limitations on that would be the date of the legislation being passed, which is July 1st. So, we are allowing you to request planning dollars that could pay for an audit that happened, say, in August of this year.

MS. COLLOPY: The next question is; “Can we submit multiple projects in a single plan?”

MS. SHIRAKH: Yes and that’s the intent. We also anticipate you might be submitting multiple schools with multiple projects in a single plan.

MS. COLLOPY: “Please explain how the free lunch portion of the funding is calculated?”

MS. SHIRAKH: I’m going to have to defer that question. I don’t know the statistics behind that. We have received that question through our e-mail process and I have that question for further clarification to the Department of Education.

But that will be a question we can respond to on our -- through our webpage.

MS. COLLOPY: “Can the energy manager be an outside consultant, meaning not a paid employee?”

MS. SHIRAKH: The draft guidelines are silent on that. I think -- so, you can hire a school employee to be that energy manager. You can also hire an outside, third-party person to be the energy manager.

MS. COLLOPY: “Can you explain the $433,000 cutoff with the planning awards?”

MS. SHIRAKH: You know, that does seem a little -- that number. But there’s definitely some logic and math behind it.

The adder actually adds -- can add considerably to certain allocations. So, in years two and three the top award in those categories is around $130,000. So, we wanted to make sure that anyone in Tier 4, because the way it works is there’s kind of a -- in Tier 4 there are some LEAs that are not doing as much as the ones in Tier 2 and Tier 3. So, it’s a little counter intuitive.

We want to make sure anyone in Tier 4 gets -- can have that opportunity to get a hundred percent of their -- a hundred and -- or at least $130,000.

So, 30 percent of $433,000 is $130,000. I’m not sure -- you know, I guess a more simplified way is it’s really a blending of award amounts through those tiers and that seemed to be the most equitable way of making some cutoffs.

MS. COLLOPY: The next question is; “Will the Conservation Corps and Workforce Development be seeking third-party trading services?”

MS. SHIRAKH: Those programs are still under development. I really can’t speak for those programs.

They are being developed independently, outside the Energy Commission. I guess my best is to just stay tuned and see what develops in those programs and what opportunities are available.

MS. COLLOPY: The next question is; “Will avoided costs be subject to weather correction? If so, who will be responsible for correlating accounts from weather stations and for performing weather progressions, the school district, or the college, or the CEC?”

MS. SHIRAKH: I’m not quite sure I know how to answer that question. So, I might refer back to we will definitely take note of that question and post a response on our Q&As because I don’t feel I would give you a good answer at this point.

MS. COLLOPY: The next question is, “Are private schools eligible for funds?”

MS. SHIRAKH: So, I’m assuming that means that’s a private charter school. So, if you are receiving funding from CDE and you fall into the eligible category of an office of education, a school district, a charter school or a State special school you would be eligible.

MS. COLLOPY: The next question is; “How long natural gas (inaudible) numbers be submitted for the LEAs?”

We’re getting a little bit of feedback.

“How will natural gas” -- again, if you can keep your phones on mute it’s really helpful.

MS. COLLOPY: Okay, I’ll try this one more time. “How will natural gas base prime numbers be submitted for those LEAs that procure their gas through third-party suppliers who don’t have a request form of their own?”

MS. SHIRAKH: We’ll take note of that and we’ll have to get back to you. You know, this program is under development. It’s a very complicated program and there are always little nuances like this that pop up. So, I apologize for not answering on the spot but we will get back to you on that.

MS. COLLOPY: The next question is on page 12, “What is the rationale for providing training funding for classified employees only? What are you envisioning for this training?”

MS. SHIRAKH: Well, the rationale for classified employees is that that was what is in the Public (inaudible) Codes, that SB 73 states.

What do we envision for that training? It’s fairly open to training that would promote energy savings, energy efficiency, energy training in your facilities. It could be a training course to help you better operate your energy management system.

It could be a course through your local utility company on how to, you know, better operate the building. It’s pretty open.

MS. COLLOPY: The next question is “Does the funding roll over from one year from the next if not expended in that year?”

MS. SHIRAKH: Yes. So, if you don’t request your funding this year, you don’t submit an expenditure plan this year, you could have year one and year two. So, it’s not a, you know, if you don’t use it you lose it, so it will be available.

MS. COLLOPY: “In regards to funding can you save each annual award and apply it to the project in the next -- in year five?”

MS. SHIRAKH: Yes and I think that’s similar to the question I just answered that this is a five-year program, money can be rolled over to the next year. Obviously, we encourage you to get those funds spent as soon as you can because these are going to be energy savings in your pocket.

So, you know, as you implement energy-efficiency projects now you’ll start seeing those benefits. But, yes, you can delay if you choose to.

MS. COLLOPY: The next question is “Will a standard project submittal form be available?"

MS. SHIRAKH: Yes, we will have standard -- good question. We will definitely have standard expenditure plan forms. We will also have standard reporting forms. And all of this is under development and will be available on our website under, you know, program implementation phase.

MS. COLLOPY: The next question is "How quickly will the funds for planning be released once the request has been made?"

MS. SHIRAKH: As I stated earlier, this first round we'll have opening in October and my understanding is that those funds will be released in November, so the following month.

MS. COLLOPY: The next question is "What are the penalties for an LEA if a project does not obtain forecasted energy savings?"

MS. SHIRAKH: I don't think there is a penalty. I think there will be audit processors here. So, if it was a glaring misuse of funding that would be one thing. If there was no energy savings because of no fault of your own, I don't think that would -- you would be penalized.

I know, for example, under our ECAA Program we have energy project loans and sometimes, you know, rarely but there are situations where you need a little technical assistance to identify, you know, why that project isn’t giving you the savings that you expected.

MS. COLLOPY: “Is there a percentage allocation for the amount of monies to be spent on Northern and Southern California?”

MS. SHIRAKH: No, there are not. This is a formula-based (inaudible) -- there’s no regional or geographical allocations as part of the formula.

MS. COLLOPY: “When will funds be released? When can I hire an architect to design the project?”

MS. SHIRAKH: Okay, the funds for your project implementation are released as an approved expenditure and you will be submitting those expenditure plans to the California Energy Commission, who will review and approve them.

And as I pointed out, then we will be releasing the funds.

So, once you have that approved expenditure plan you can move forward on your project implementation.

MS. COLLOPY: The next question is “Can you provide more information on the type of activities covered under planning and audit fund requests? Would this include benchmarking, data analytics, development of detailed implementation plans with multiple projects?"

MS. SHIRAKH: Yes. Benchmarking is an allowable expense under the category of Prop 39. That's on page 9.

Data analytics would fall under the category of energy surveys or energy audits. We have three -- so, we're going to have the ASHRAE Level 2 audit. Energy surveys for data analytics. That's the 85 percent of energy planning funds can be on that.

And then benchmarking, identifying all your utility data information to get that utility data release form. Any of this documentation, paperwork effort that goes into Prop 39 can be considered an energy planning expense and paid for with these energy planning funds.

MS. COLLOPY: The next question is "What could (inaudible) -- one moment.

The question is "What provisions are in place to ensure that schools take advantage of existing utility e-programs, the application to their e-progress? What Prop 39 funds are (inaudible) --"

MS. SHIRAKH: We encourage leveraging of any funds you have access to. So, you have (inaudible) programs, other programs that are out there. There's absolutely no penalty for that and, in fact, it's greatly encouraged.

So, it's really important that, yeah, we're encouraging people to leverage with the utility programs.

MS. COLLOPY: The next question is "Are you required to spend all of the funds each year?

MS. SHIRAKH: And I think we've answered that. No, you're not required to. It rolls over to the following year.

MS. COLLOPY: The next question, "It was noticed to LEAs, public school districts will be notified of their award amounts in the next couple of weeks. How and to whom will this notification be made?"

MS. SHIRAKH: Okay, good question. The CDE will be announcing that. We will also -- on our webpage we will also have that listing of all the LEAs and the awards on our Energy Commission webpage, as well. So, there will be two ways of noticing that.

I would imagine the Energy Commission will probably, as well as CDE, send out an e-mail blast.

MS. COLLOPY: If you're not already part of the Prop 39 list serve at the Energy Commission, it's really important that you go to the Energy Commission's website, Prop 39 webpage, and sign up for the Prop 39 list serve. You will be notified of every activity that then occurs from this point forward.

The next question is, “On page 19 where will LEAs put the data for input values for the SIR calculator for vendor or contractor?”

MS. SHIRAKH: Definitely that’s one method. You could get those yourself if you have that capability. We’ll have the energy savings calculators available, where you put in the energy savings, demand savings and get that off of your utility bills.

You would have to get the project installation cost from your contractor, so kind of a combination.

MS. COLLOPY: The next question is “Can LEAs use Prop 39 funds to replace old, portable buildings, assuming a more energy-efficient building is provided?”

MS. SHIRAKH: No, this would not be for the whole building. This is for equipment within a building and equipment within existing buildings.

MS. COLLOPY: The next question, “Is there a deadline to expend the money from the time of your grant approval per year?”

MS. SHIRAKH: No, but there is a final deadline. The final deadline is June 30th of 2020. That’s when all projects will have to be completed.

Obviously, it’s encouraged that you complete them sooner. As we go through the first year, the first couple of years of project implementation, you know, we’ll have to assess how fast these projects are moving forward.

But at the current time the final date is June 30th of 2020.

MS. COLLOPY: The next question is “If a district would like to hire an energy manager right away to help with the planning and benchmarking, and eventually continue on during the life of the project and the Prop 39 program, can they get an early release of funding for the energy managers concurrent with the planning funding release?”

MS. SHIRAKH: Good question. Once the expenditure plans are available in December it could be just a simple request for that energy manager through that.

So right now, the way it’s structure is that you can ask for up to 10 percent. So, if you were doing that out of your first-year funding, that would leave 90 percent available for funding. So, I guess that would not (inaudible) --

And I’d also like to point out that we do -- we are incurring that first-year funding for those Prop 39 planning activities so schools will have that available even if they’re not planning to hire an energy manager this first year.

MS. COLLOPY: The next question is “What if our school has so much existing solar generation that there are no net energy charges? I do still have data on some portions that is not able to be determined solely by looking at the electricity bill.”

MS. SHIRAKH: Well, we would look at your consumption, so we would be requesting that. Again, there’s going to be a lot of individual unique situations here and we’ll have to try to deal with those as programs develop. But we will definitely be looking at your energy consumption.

MS. COLLOPY: The next question is, “From page 11 of the guidelines it states that the LEA’s receiving over $1 million must spend 50 percent of their allocation on projects over $250,000. Can the entire $250,000 be spent on one school site or can a project be a single project across multiple school sites, such as an EMS installation at multiple school sites?”

MS. SHIRAKH: The current rate structure is that would be $250,000 at a single school site. You know, this is a kind of an interesting requirement of SB 73, so we -- I encourage you to submit, you know, what LEAs think will work best for them.

But as currently the way it stands is that would be by site.

MS. COLLOPY: The next question is “Can the yearly allocations be rolled over and extended in future years and on larger projects?”

MS. SHIRAKH: Yes, yes.

MS. COLLOPY: The next question is “Can a school district utilize Government Code Section 4217.10, the energy conservation provisions to award a contract?”

MS. SHIRAKH: Yeah, I am not familiar with that specific code requirement. My recommendation is that you, again in our contract section, you follow your procurement requirement, but you also need to be aware that the statute regarding Prop 39 funding has specific requirements. So, your legal department may need to make a determination on that.

MS. COLLOPY: The next question is “There are several months of delay built into the funding process. When can the LEA begin contracting for work? As soon as CEC approves or must they wait for the allocation to be received? Would the ECAA funding be available quickly enough to provide the bridge funding?”

MS. SHIRAKH: It’s my understanding that as soon as the Energy Commission approves an expenditure plan the LEAs can begin working on that project.

They wouldn’t have to actually wait for the CDE to cut the check. And it's my understanding, from CDE, that's a very common practice.

So, I hope that answers that particular question.

MS. COLLOPY: The next question is "If the Prop 39 funding will be for five years and the State will not receive enough tax revenue in later years, will it be possible that we will not receive money due to lack of funding?"

MS. SHIRAKH: You know, it's possible, I can't predict. That is unknown at this time. The revenue is expected to be in and you're expected to receive your allocations.

MS. COLLOPY: The next question is "What fund resource should the funds be deposited into?"

MS. SHIRAKH: To me that sounds like a question that each LEA, the county mechanism would have to work out, or a CDE question that I am -- you know, from the Energy Commission's perspective, that's a question I can't answer.

MS. COLLOPY: The next question is "Can an LEA use Section 4217 to select a private (inaudible) -- so long as the selection is competitive and not sole-source?"

MS. SHIRAKH: Again, you need to defer to your local and whatever your regulations are.

MS. COLLOPY: The next question is “In terms of leveraging additional dollars, can LEAs buy down their payback period by putting bond dollars or deferred maintenance dollars toward their Prop 39 projects?”

MS. SHIRAKH: I’m not quite sure how to answer that question. We’ll get back to you on the Q&As on that one.

UNIDENTIFIED SPEAKER: Okay, next question is from Peter Woofer (phonetic).

MS. SHIRAKH: It says (inaudible) -- I’m sorry but I’m not sure what you’re referring to, so I think we’re going to go to the next question.

UNIDENTIFIED SPEAKER: And the next question is “Southern California Regional Energy Networks (inaudible) -- have been developing a method for expediting project identification and implementation by signing master agreements with a pool of professional providers, as well as contractors through an open solicitation process. If we were able to do this with our project with CCEJA and (inaudible) -- in which public agencies and joint (inaudible) -- can have access to those services. And so the vendors were selected through an open selection process and schools are used to joining for these service for purchasing supplies.

Is it acceptable for the procurement, per the rules, or is this considered sole-source by the Energy Commission?”

MS. SHIRAKH: Again, I’m seeing definitely a pattern on this kind of question and you’re probably tired of my patterned response. But again it’s -- you’re going to really have to defer to what your authority allows you to do. And we’ll try to provide a little bit more clearer direction on that, but that’s really going to be unique to each organization in regards to that.

But as long as you are -- you know, you have to find that balance between what your regulations are what the law says regarding that.

UNIDENTIFIED SPEAKER: The next question: “Is effective use of lights (inaudible) -- how does the Energy Commission recommend the appliance be useful for other types of energy-efficiency projects?”

MS. SHIRAKH: I guess if you have some specifics, maybe you can send those in. I have talked to our engineers and, you know, regarding some of the renewable generation-type projects. We can probably look at that on a case-by-case basis.

But if you have specific energy-efficiency projects that you feel are not listed on that list, then send those in through the docket process and we'll see if we can address that.

MS. COLLOPY: Okay, so the next question, "Is a charter school eligible if they reimburse the landlord for actual use of any costs, provided they receive copies of energy bills?"

MS. SHIRAKH: Yes, that sounds like you will be responsible for your energy bills, that you are paying the energy bills of your facility. So, it sounds like that would be eligible.

MS. COLLOPY: "How do you intend to treat matching funds from overlapping IOU programs?"

MS. SHIRAKH: Well, again, I guess that would be matching funds to your project. We are encouraging, as I said before, any leveraging you can do. So overlapping, so I suppose if you are both -- you know, specific utility companies and you're able to get matching or some kind of resources for that project, it sounds like a good opportunity. I'm not sure I'm answering that question quite properly.

MS. COLLOPY: And a reminder that what we're going to do is we're going to save all of these questions. And the ones that we are unable to answer today, we will put on our Q&As, and you can refer back to our website to get the answers to the Q&As.

MS. SHIRAKH: Yeah, because there's just a lot of questions that -- you know, this is a new program and there's nuances that we just haven't come across, yet, that will obviously happen once the program starts to roll out and the guidelines are adopted.

MS. COLLOPY: Okay, so the next question is "Does the ETA's Portfolio Manager qualify as benchmarking?"

MS. SHIRAKH: Yes, it does.

MS. COLLOPY: The next question is "Are there retrofitting product requirements such as DLC, or UL-approved requirements for lighting projects?"

MS. SHIRAKH: No, I don't believe there are any product requirements. It's more of an energy savings requirement that these are cost-effective. That's the criteria for eligible projects.

MS. COLLOPY: The next question is "Who do we contact to get a custom audit?"

MS. SHIRAKH: Okay, again that could be a third-party vendor that could be used. That could be through our Bright Schools Program, our (inaudible) -- and, you know, I think I mentioned earlier we will put together a handbook that has various resources.

MS. COLLOPY: The next question is "Will future utility bills be used to validate the savings? If so, how are factors like weather and occupancy changes taken into account?”

MS. SHIRAKH: And we’ve answered this before. So, again, there’s two methods, the general growth and the project-specific.

MS. COLLOPY: The next question is “Some districts have projects that are identified on the energy expenditure plan that can be completed with Prop 39 funds, but they’re also slated to receive funding through the State Allocation Board’s Emergency Repair Program. Can districts fund a project with Prop 39 funds and if their project is eventually funded through the Emergency Repair Program re-use or reimburse the Prop 39 funds to be spent on other projects on the approved energy expenditure plan?”

MS. SHIRAKH: I think that would be a situation where you could do that but if you were, in fact, then funding that approved project from another funding source, you would have to resubmit an energy expenditure plan to, you know, identify the alternative projects that you’re changing to. So, yes, and you would have to send in a new expenditure plan.

MS. COLLOPY: The next question is about benchmarking. “Who exactly reports the EUI (phonetic), is it all schools in the LEA or just the ones selected to receive the funds?"

MS. SHIRAKH: It's just the ones selected to receive the funds. Again, we encourage you to use that methodology to help identify school sites that may be the biggest energy users, but as a requirement of the Prop 39 program it's just the ones receiving funding.

MS. COLLOPY: The next question is "Can installing trees for shade purposes be allowed?"

MS. SHIRAKH: Good question. I guess we would have to see the energy savings calculated for that. And I think the intent of the program is that we'll have to see how that works through the project economics. Again, it meets that SIR requirement and that cost-effectiveness requirement.

So again, on this question you should probably check back with our Q&As as we approach approval of the guidelines.

MS. COLLOPY: The next question is "If the LEAs request planning funding and it is approved, is it left up to the individual LEAs to internally execute the planning or subcontracts for jobs and utilize the funding to pay for this project?"

MS. SHIRAKH: Yes.

MS. COLLOPY: The next question "Is interest earned on the Prop 39 apportionment to be kept by the district? If so, must it be spent on Prop 39 projects or other projects?"

MS. SHIRAKH: I can't answer that. That's a great question. I'm happy to talk -- we'll have to work with CDE on that question. Yeah, that question will definitely be clarified in our Q&As.

MS. COLLOPY: The next question is "Is greenness also included in the funding?"

MS. SHIRAKH: I'm not sure what that means. It relates to the question we just answered about trees or it could relate to maybe, you know, greenability, like using recycled materials in your classrooms. This has to be energy related. So, if it's an energy project that improves indoor air quality or something like that, we have built into the SIR calculator non-energy benefits. So, those types of green or health safety benefits are kind of built into the calculator already.

So, again, it really has to meet that SIR requirement or that energy -- that cost-effectiveness requirement.

MS. COLLOPY: "The guidelines indicate that SSPI will use its standard process to correct LEA noncompliance. What does this mean, specifically?"

MS. SHIRAKH: I will probably -- we'll probably have to get a specific answer for you from CDE. I don't want to misspeak and that's not our agency, so I'm not absolutely clear on what their standard practice is.

MS. COLLOPY: A follow-up to that question is "Will LEAs have to provide copies of contracts, purchase orders, warrants, requests for qualifications, bids, et cetera to the SSPI or the CEC?"

MS. SHIRAKH: You will not have to do that for the California Energy Commission. But again, all that documentation I would imagine would be needed for an audit, and these will be audited through the normal CDE process.

MS. COLLOPY: "Will LEAs be able to use resources to hire an energy manager through outsourcing or will LEAs be required to hire an energy manager in-house as staff?"

MS. SHIRAKH: Okay, so we've answered that. So, it's silent. Either way is acceptable.

MS. COLLOPY: The next question is related to water. "Are water conservation projects included?"

MS. SHIRAKH: If they have an energy component. If there's an energy savings benefit. Again, they have to have a savings, not just water savings, not just non-energy benefit savings, but there needs to be an energy savings benefit connection.

MS. COLLOPY: The next question "If an LEA has already done a lot of energy efficiency can they apply all of their funds to solar projects?”

MS. SHIRAKH: In the expenditure plan we will have a certification box that says that you have done energy efficiency and we will actually have you list what those energy-efficiency benefits are.

And also, those renewable projects would also be required to meet the SIR cost-effectiveness criteria.

So, I would say yes if you fit into those two criteria, those two standards.

MS. COLLOPY: “If funds are not requested by an LEA in the current year, can they roll over to be requested in future years?”

MS. SHIRAKH: Yes. That’s a repeat of a question we’ve had.

MS. COLLOPY: “How will you handle facilities that are being moderated” -- I’m sorry. “How will you handle facilities that are being modernized or new construction where historical energy data may no longer be relevant to the new, modernized facility?”

MS. SHIRAKH: That’s a good question. So, for -- I should make it clear that this program is for retrofit of existing buildings so, yes, that’s a valid question for a major modernization. And that’s, I think, one of those unique situations we’ll have to consider.

This program does not provide equipment for a new construction project.

MS. COLLOPY: “If (inaudible) -- must be broken out by the site, then won’t LEAs run over their max number of expenditure plans per year? For example, a large district may want just the lighting retrofit across 20 sites. How will that work? The reason for doing one measure across multiple sites is to get the best pricing, so this is a very real situation.”

MS. SHIRAKH: Yeah, we understand that and that the challenge is that we have to -- these projects need to show energy savings and we need to show the -- compare it by site. We really have to have it broken down by site.

Regarding the comment, you know, will we exceed the four expenditure plans per year, again that -- you know, that’s an area that we could possibly, you know, consider other options. And so if we hear that comment often, maybe we will reconsider that.

But, you know, at this point we were trying to limit -- providing LEAs with large allocations some flexibility, also minding that the Energy Commission has a workload issue in reviewing all these expenditure plans.

MS. COLLOPY: The next question is “The CEC may have to review thousands of expenditure plans in a single fiscal year. What is your estimated turnaround time for approval of a plan? How will the CEC ensure timely review of the approval of a plan? And will you consider contracting of a third party to perform the technical review of the plans and interact with the LEAs and CDE to correct any problems?”

MS. SHIRAKH: That’s a three-point question. The third point, at this point we’re not planning to do outside contracting. We’re planning to have the Energy Commission staff. We are going through a process of hiring additional staff to manage this. We do recognize, like I had said before, that this is definitely a workload-intensive program.

How long is it going to take us approve an expenditure plan? I think that really -- the devil’s in the details. If an LEA submits an expenditure plan with all the required materials, we could be able to do it.

If we get expenditure plans that don’t have supporting documentation or have information missing, that definitely adds to the time of going back and forth, and getting that information, and processing that.

So, you know, it’s really hard to -- you know, I don’t have a crystal ball and so I really can’t tell you that at this point in time.

One thing just to note, though, is that when the Legislature did pass this law, the Energy Commission was given a few positions to do this work. So, that’s when we are hiring new people, those are additional positions just to handle this Prop 39 expenditure plan review workload.

The next question is the CEC -- oh, I’m sorry, I just answered that question. “Will the Prop 39 projects be subject to the new AB 1565 prequalification requirements and the energy (inaudible) -- for the provisions set forth in the Government Code be used for Prop 39 funds?”

I did note that the sole-source requirement is definitely an issue that folks are concerned with. So, I kind of ditto the same response I’ve had on this question.

The next question is rather confusing, but it’s about the calculation for the energy planning reservation option on page B. Some folks think this is a concern. LAUSD has approximately 825 sites, with a scoring allocation maximum of $850,000 through 1718, and we’ll fund the (inaudible) -- site.

It says, “This does not seem equitable given the size of their school district. What are -- we are seven times the enrollment of the next largest school district. Can the planning dollars amount be increased proportionally in order to accomplish activities over the five-year period or for the five-year period?”

And, you know, the challenge of this program, obviously, is that we have LEAs, you know, huge ones like LA Unified School District, then we have little charter schools that might have five children.

And so, obviously, one size doesn’t fit all. And this is, you know, a time to collect public comment and we will take that under consideration.

So, again, please make your public comment by the public comment date so that we can consider this question in the final drafting of the guidelines.

“Will the guidelines apply for all five years of the program or should we anticipate updates for every year of the program?”

I think we will have a fix to this once this comes out. Whether that’s a yearly thing, I don’t know. But with a program as complex and with this much funding, I will imagine that we will have revisions to this once it’s out.

But again, it’s important that you all sign up for the Prop 39 list serve with the Energy Commission.

If any guideline changes were to occur, we would use that list serve to communicate with our stakeholders about any changes and your opportunity to participate in any changes.

And any changes will also have to go through an Energy Commission Business meeting, which is publicly noticed 30 days in advance, so we would follow all the normal protocol.

You know, we're doing our best not to have that happen but, you know, again --

The next question is "If an LEA has already documented as much as 20 percent reductions in electricity use prior to the program, will be in effect a (inaudible) participant?

I don't -- you will not be punished for that. You know, kudos to you for doing so much energy efficiency already.

Use this opportunity and, you know, if you have all -- again, following that sequencing of facilities, if you're done all your energy efficiency the next line, you know, the next priority is looking at renewable energy generation. So, see what you need for other facilities and go through that sequencing process.

Here's a question about "Would an LEA be financially liable if not meeting the energy savings anticipated after a project has been completed?”

And I think we’ve answered that and that will definitely be a clarification question.

“If we install energy-efficient air conditioning systems that use a lot less energy, but then we have a year that’s very hot how will the two options you mentioned accommodate the change in weather so that the report still shows energy savings, i.e. increased usage of energy?”

And again, we’ve answered that.

The next question is “Are projects’ soft costs included?”

Project soft costs design is included as far as an acceptable project cost for your energy project. So, it would be an acceptable cost to include in the total project cost.

“Who would complete the financial audit of the program? Also, is this required generally or at the end of the program?”

So, again, it’s California Department of Education’s auditing process. And we’ve had several questions about that so there will be some clarifications on what that audit process is, and what are the consequences if you’re found in noncompliance.

The next question is “Currently our public energy utility members, the CMUA, provide an annual report to the CEC as required under SB 1037 to track energy-efficiency improvements for commercial and individual businesses, and residential customers. Will our utility continue to track these energy-efficiency Prop 39 projects under SB 1037?"

I don't know how to answer that question. We will definitely need clarification of that from the folks in the Commission who work on this, on the programs. So, we will definitely be putting that in our Q&As.

"If a school is eligible to submit a five-year plan, are you saying that the allocation for the plan is tabled in the first year?"

Good clarification question. So, you can put together a five-year plan. In receiving your first-year allocation and having anticipated what those second, third, fourth and fifth year allocations would be, but you would not actually be receiving the five years.

Obviously, we would have to revisit that plan to see, as the years go on, to make sure the allocations are matching the projections and the projects are still identified as projects that you would still need to do.

Another question is "How do you intend to match billing data with the meter in order to get school-level energy usage data? We are worried that the utility data is at the meter level and we've had experience trying to do this type of matching."

Yeah, we do understand that there is -- you know, metering can be complex. It doesn't necessarily match a specific building. Campuses have multiple meters. Campuses have one meter. Even understanding a meter might go over two campuses.

So, we will have to -- we're having to consider these more interesting, you know, metering building situations. And we are working with the utilities to try to hammer out those kinds of situations. And once we have clarity on how the matching will work or how it works with your buildings we will, again, be providing further clarification to you through our Q&As.

MS. COLLOPY: The next question is "Please repeat the date for retroactive limitations for projects? I believe you said December."

MS. SHIRAKH: Yeah, so if a project is through the expenditure plan process it will be December, the date that the guidelines are approved. Right now that's meant to be December 19th.

For, I'm going to repeat, the planning dollars the retroactive limit is when the legislation was approved and that is July 1st.

So, you could use your planning dollars to pay for activities that happened between July 1st and when these planning funds will be available in October/November.

MS. COLLOPY: The next question is “What happens to LEA funds that are not applied for in a given year? Do those funds rollover to the next year of the program and increase the overall funding level or just given back to the State?”

MS. SHIRAKH: Yeah, and again we’ve answered that. They will be held in reserve for the LEAs.

MS. COLLOPY: “What question and answers (inaudible) -- Prop 39 during October and November, if not could they be?

MS. SHIRAKH: Yes, they will be.

MS. COLLOPY: And again, the Q&As are going to be living, breathing documents and we’re going to be adding to those on a regular or routine basis so that all of these nuances that you’re asking about can really be fleshed out and then documented for your assistance.

“How many monetized NEBs are in the (inaudible)?”

MS. SHIRAKH: Well, we’re using a standard adder of 3 percent for non-energy benefits, that’s NEBs, so that would be looking at all kinds of non-energy benefits. Health, safety, you know, indoor air quality.

We did some analysis and we're looking at all the various adders that different energy projects have and that was a percentage we felt comfortable with. And so it's kind of a general adder to all projects.

MS. COLLOPY: Here's a question asking if "Are these State or Federal fund grants?"

MS. SHIRAKH: These are State. This is through a change in corporate tax code that happened through Prop 39 and was approved by the State of California last November.

MS. COLLOPY: "Regarding the requirement for data analytics, such as no-touch energy audits, to receive validation from a local utility is validation required from just one utility in the State or is it required for each region, territory in which the analytics is being used? Is there any guidance on what validation is sufficient?"

MS. SHIRAKH: Yeah, for this first year we really don't have any valid guidance for what validation is. The intent is this is definitely an area we plan to expand on as the program is underway. And we hope to have more guidance on that on years two through five.

MS. COLLOPY: There's just a comment out there that it would be helpful if the CEC would provide a response to these questions on our website.

And again, we will be providing responses to these questions and other frequently asked questions on the Prop 39 website, which is on the Energy Commission's, you know, main website. So, yes, the responses will be posted.

"Public Resources Code Section 26233(d) state: 'For every LEA that receives over $1 million pursuant to the subdivision, not less than 50 percent of the funds shall be used for projects for the $250,000 and achieve substantial energy efficiency through the energy and job benefits.'

As a Tier 4 district, (inaudible) -- based project will force a very inefficient approach to the more expensive and time consuming.

Where in the law is the project required to be at a single site?"

MS. SHIRAKH: So, again, this question has come up and I -- it is not in the law, but it is a specific -- we've had a lot of discussions around this and at the moment it's site-specific. This may change if we get a lot of comments on this.

I think the logic was that it was a really great way to try to get deep retrofits in a school site by having that investment. Also, the requirement that we -- we have to document the Energy Commission’s website.

But again, these are draft guidelines and we’re open for comment. And, you know, if we see this as a repeated comment, then that gives even more merit to considering the changes to those requirements.

MS. COLLOPY: The next question is “In your experience do you see LEAs apply for funds have already identified the schools to receive the upgrades or are you expecting the benchmarking to actually help identify the opportunities?”

MS. SHIRAKH: I think there’s a variety of situations out there. I don’t think there’s a one-size-fits-all. I think some it will help and some have projects identified, and some have no idea.

MS. COLLOPY: The next question is “What happens to any funds not expended after the fifth year of the program -- at the fifth year of the program?”

MS. SHIRAKH: We will get back to you on that. I’m not sure what that situation is on that.

MS. COLLOPY: The next question is about benchmarking. “The criteria states that only the school sites applying for Prop 39 funds need to be benchmarked. Doesn’t this contradict the benchmarking exercise in which you benchmark all of your service accounts, and then analyze the data to figure out which facilities would best use the Prop 39 funds?"

MS. SHIRAKH: We encourage you to do that. We, again, are trying to stay flexible, leaving that an option for LEAs, but not a mandate. So, again, we encourage that but we are only requiring to see that energy index or intensity metrics for the ones that are funded.

MS. COLLOPY: The next question is related to training. "Much of the building operation is not fulfilled by classified employees, but rather by teachers that control over energy use in their classrooms. Would recommend opening the training to train all facility and staff, not just classified employees."

MS. SHIRAKH: Again, this is part of the statute language in the statute. We don't have the authority to change that. And at least for this first year we have to abide by those rules.

MS. COLLOPY: So, if you want to get your comments on the record, you can take your comments to the docket related to this. And if there is a legislative change in the future, this is something that can be considered.

"Currently, the guidelines treat LEAs equally with respect to publicly-owned leased facilities without separate meters. Where are those LEAs must coordinate to submit a combined request for planning a project or expenditure award.

Would there be an additional consideration given to the LEA which owns the property, given the transitory nature of the charters? So, like in LA School District had a number of charters co-located on the site with agreements for one or two years only. What happens if the charter leaves the site and the space is no longer used for that intended purpose? Can a charter then generate funding based on enrollment, which includes co-locating sites, use those funds in another one of its charters?”

MS. SHIRAKH: The charter school complexity is really -- it’s a huge thing. And the leased facilities, we may have to have further clarification in the guidelines to address the nature of charter schools and the fact that they may not be there as long as the -- as a typical school.

So, point taken and thank you for your comments to show that there is a lot of complexity in this.

MS. COLLOPY: We encourage your questions regarding the charter schools, in order to get clarity I encourage you to make comments through the docket so that those are in the record and can be considered when we change or before we finalize the guidelines.

The next question is “How do you define LEA school?”

MS. SHIRAKH: LEA School. So, LEAs are a school district, a charter school, a county office of education or a actual -- a special -- a State special school.

And that’s on page 5 of the guidelines, under eligible applicants.

And so maybe some of the confusion there is we’re really using the word “LEA” and not LEA school.

MS. COLLOPY: Can an LEA install renewable energy before they do available energy-efficiency measures if they meet the SIR and have considered all aspects of the program?”

MS. SHIRAKH: I think we’ve answered that. So, there are two ways of doing, of documenting or having that renewable energy project as part of your expenditure plan. But you would definitely have to certify through the expenditure plan that you have done energy efficiency, and then meeting the SIR requirements.

MS. COLLOPY: “Does DSA’s structural requirement, beyond the basic cost of the energy projects included as an allowable cost? Allowable cost means any DSA-required structural requirements for energy projects."

MS. SHIRAKH: We are aware that there are DSA triggers that have -- that add to the cost of your projects and we are working with DSA. We will have some clarification language in the final guidelines.

MS. COLLOPY: If an LEA has a large modernization project that includes eligible energy projects do the energy projects need to be contracted separately?"

MS. SHIRAKH: Well, I guess my response to this would be you would need to be able to document the energy savings and the cost of those projects. And if you can pull that out of your existing contract, then that would be -- you wouldn't have to do separate contracting.

We're not asking you to do separate contracts. We're just asking that that project cost and energy savings of those projects be identified.

MS. COLLOPY: "Are the 2014 supposed to be expensed in 2014, as well as 2013 awards?"

MS. SHIRAKH: I am making -- so, if it's for energy planning, the energy planning funds that you request now can be used through this five-year program. And if you're requesting funding through the energy expenditure plan for project implementation there's not a requirement that those have to be spent in this fiscal year.

Again, those can -- that project can take and we know that it does take, sometimes, laps over to multiple fiscal years to install.

MS. COLLOPY: The next question is "With up to 1,000 LEAs submitting expenditure plans at approximately the same time, how long do you anticipate taking to review, to approve these plans?"

MS. SHIRAKH: And I think we've addressed this question already.

MS. COLLOPY: "Is there a cost-sharing requirement from submitting schools or can the whole project be paid for by Prop 39 funding?"

MS. SHIRAKH: There's not a cost-sharing requirement. We encourage leveraging, but it's not a requirement. So, Prop 39 funding can be used for the whole project.

MS. COLLOPY: The next question is "Who do we send our requests for planning funds, e-mails, project dates, and this due date for October?"

MS. SHIRAKH: So, that will come out through CDE, they will be -- and we will also have that same information with the link to the CDE webpage. So, that will be a request through them.

(Inaudible) -- did the request last August for the bundling of one- and two-year funding. It will be available online. But my understanding is that an LEA can also submit that, not just online. And they will be providing you that information.

MS. COLLOPY: The next question is about the data information. “Is the CEC developing a specific CISR form with the IOUs so the schools can sign up beginning their project in order to minimize any issues for getting the data?

Furthermore, can a consultant be hired to assist with the LEAs be included in the CISR so that they can help manage -- help us manage this better?”

MS. SHIRAKH: I am not familiar with the CISR program. So, I can’t speak to that. We can provide clarification in the questions and answers.

MS. COLLOPY: David Cullen (phonetic), I just took you off mute, if you wanted to follow up on that question so that we can answer that better.

David Cullen?

Okay, we’re going to go ahead -- David? David, we’re going to go ahead and put you back on mute. But we will follow up with you on this. You can e-mail me directly, Christine Collopy, or we’ll make sure we get this in the Q&As when we understand the question a little bit better.

The next question is “If the project requires DSA approval, can Prop 39 funds be used to fund the DSA requirements that may not be energy related, such as ADA requirements?”

MS. SHIRAKH: Yeah, and that was asked a few minutes ago and so we’ll be providing clarification on that through the final guidelines.

MS. COLLOPY: “Is it only encouraged to leverage IOU rebates and incentives or required to fund EE projects?”

MS. SHIRAKH: It’s just encouraged. There’s no match requirement for the program.

MS. COLLOPY: “If utilities’ energy-efficiency programs are leveraged, how would the energy savings be attributed? Would utilities be able to claim those savings in their SB 1074 or on the CECD (phonetic) claiming these savings? We want to ensure that there is no double counting for the CEC’s for planning.”

MS. SHIRAKH: Well, we will be -- part of the Prop 39 program is that the Energy Commission will be reporting to the Citizen’s Oversight Board, which will be created to oversee this program. And we would, you know, most definitely be coordinating with the utility companies, you know, so there isn’t some double counting.

MS. COLLOPY: Yeah, we’ll make sure the attribution is clear on Qs & As as well.

The next question is “What do you need from a utility participating in cost-sharing on Prop 39 budget?”

MS. SHIRAKH: There is no cost-sharing requirement.

MS. COLLOPY: “On page 11, the funding sources that can be used to leverage Prop 39 funds. Can private investments, like loans and leases, also be used to leverage Prop 39 funds as is common in ECHO (phonetic) projects?”

MS. SHIRAKH: Yes.

MS. COLLOPY: The next question, “Can an expenditure aware requirement, the Tier 4, for every LEA that receives over $1 million” --

MS. SHIRAKH: Okay, we’ve had this question. Unless there’s some specific comment.

MS. CLOSSON: -- “does this mean that 50 percent has to be used on energy-efficiency in total on those projects or on a single project?”

MS. SHIRAKH: So, a single project costs at least $250,000.

MS. COLLOPY: Okay, so it’s a single project that costs at least $250,000.

“CNUA would encourage the schools work closely with their local electric and gas utilities on proposed projects in gathering utility-related data.”

That’s a great comment.

“Page 18 says LEAs must provide documentation of prior validation of technology for data analytics done in local utilities. What does this documentation specifically have to contain within it?”

MS. SHIRAKH: We will have to provide some clarification on this first year for that. We had that question just a few minutes ago.

But further development of the analytic foundation will occur, as I said before, in your (inaudible).

MS. COLLOPY: “How did the service (inaudible) -- get set at four years and how does this get changed? I’m unaware of an instance of a changes in lamps every four years.”

MS. SHIRAKH: Okay, the equipment on that page from the database. I will double check with our engineers, but it’s my understanding all the useful life years on that does come from a standard database that has done a lot of research on energy-efficiency projects. So, well provide some clarification on that for you.

MS. COLLOPY: And if you have concerns about that, again, we encourage you to submit comments about these guidelines to the docket.

The next question is “All the restricted-only hires, as stated on page 15, number 11, use a member of the California Conservation Corps or can we hire general contractors to perform the actual physical work?”

MS. SHIRAKH: On page 15?

MS. COLLOPY: Page 15, Item 11.

MS. SHIRAKH: These are just for consideration. You could hire -- you have your choice of who you hire for project surveys.

MS. COLLOPY: So, on page 15, it’s just a recommendation, it’s not a requirement?

MS. SHIRAKH: Yes, these 11 items are part of SB 73 and it asks that all LEAs consider, not actually do, but consider these 11 elements.

MS. COLLOPY: The next question is “Can submeters be expensed as part of the energy planning reservation in order to perform energy savings and data analytics?”

MS. SHIRAKH: Which one are we on?

MS. COLLOPY: “Can submeters be expenses as part of the energy planning reservation in order to perform energy savings and data analytics?”

MS. SHIRAKH: That is something I need clarification on. That’s a good question. We’ll clarify that.

MS. COLLOPY: The next question is “Can you please elaborate on an earlier answer about what can be included in a single project and single energy expenditure plans? Did you mean that the SIR must be applied only in measurable (inaudible) -- to a single campus, but that more than one project may be included in a single energy expenditure plan?”

MS. SHIRAKH: Okay, so an energy expenditure plan -- what part of the measure? So, you have -- one school has five measures, so for that particular school of the bundled measures has to have an SIR of 1.05.

You could have multiple sites on one expenditure plan. So, say that LEA has five schools on that expenditure plan, each of those five schools would have their portfolio of projects. And that SIR needs to be -- that criteria needs to be met by the school site.

MS. COLLOPY: Okay.

MS. SHIRAKH: I’m hoping that -- you know, it’s really hard to have this kind of one-way communication, you know, of question and answers. So, again, I apologize if I’m not being as clear as I should be to answer the questions.

But, you know, basically, an expenditure plan could come in, it could be one school with one project, that would be the very basic, or it could have multiple campuses, multiple school sites, with multiple projects.

MS. COLLOPY: Bruce (phonetic), this was your question. I just unmuted you and feel free if you want to speak.

BRUCE: Yes, the answer to be question there, it was not quite clear with terminology using the various phases of the project. So, thank you for that.

MS. SHIRAKH: Thank you, Bruce.

MS. COLLOPY: Thanks.

Okay, the next question is “According to the allocation outlined in the guidelines and the size of our district can we have an energy manager and other appropriate (inaudible) listed in the execution and implementation of the Prop 39 program?”

MS. SHIRAKH: Yes, definitely.

MS. COLLOPY: Here’s another question about Government Code 2217 and can it be utilized?”

MS. SHIRAKH: I can’t answer that. I’m not familiar with that Government Code. So, you would need to seek information from your counsel.

MS. COLLOPY: The next question is “Do the best practices cost guidelines, found on page 9, create upper limits on plan funds? In other words can an LEA, who is eligible for $130,000 use that full amount if they want to do a more comprehensive planning that ends up costing more than 20 cents per GSF (phonetic)?”

MS. SHIRAKH: Okay, so I think I’m understanding your question, 15 to 20 cents per square foot is the guidelines for what an ASHRAE 2 level audit would cost. And the guidelines of 2 cents to 5 cents per square footage is our guidance for energy surveys and data analytics.

So, those are kind of the limits of how you would spend your 85 percent of your funding. We just want to have some parameters that guide both the LEAs in understanding what the typical costs are, and putting some limits on what those costs are.

MS. COLLOPY: The next question is a follow up. “If the LEA’s (inaudible) -- does not have the staff capacity to even manage these planning activities can the energy manager funding award be placed -- released early and concurrent with the planning funding in October or November in order to manage the data collection, benchmarking activities, or planning activities, et cetera? LEAs may not have the current personnel capacity to be able to coordinate all these planning activities and create an expenditure plan and do all the forms."

MS. SHIRAKH: I think we've answered that before but I guess I'm hearing a pattern here. That might be something we would consider in the energy planning. But it's really available quite easily as soon as the expenditure plans are released in December by requesting that. There's not any up-front documentation that's required to request funding for an energy manager.

But, yeah, I'm hearing what you're saying here and it will be under consideration.

And again, as Christine said many times, please submit these comments in through the docket process. That has potentially -- potential changes to the way the words are right now and some of those rules.

MS. COLLOPY: And just kind of a clarification on what the difference between Qs & As that are posted on the Prop 39 website, and then submitting a comment through the docket, just understand, please, that when you have a question here we're going to be providing clarification on our website.

But these questions and these answers will not be put through the docket. The docket is a formal way for the Energy Commission to receive your comment on the official record and for us to consider those when we're adopting the final guidelines.

So, if you feel like you've made the comment here on this WebEx and you think that's enough, but you really want the guidelines changed, I just want to emphasize to you that you must use the docket information that's on the screen, WebEx right now so, anyway.

Okay, the next question is "Can sole sourcing be used when the zero interest loan is used and not a grant?"

MS. SHIRAKH: Okay, so I guess when you say zero interest loan that's our ECAA Loan Program. And the same SB 73 requirements are going to be for our ECAA Loan Program because that's the funding source for these. So, the program opportunity notice will be available in the next month or so for our ECAA Loan program because we are having to modify it to mirror the requirements that are in the Prop 39 guidelines that we're seeing.

MS. COLLOPY: The next question is "Can Prop 39 funding be used for the ADA requirements for private projects?"

MS. SHIRAKH: So -- oh, that's the DSA. Again, we will be providing some clarification on that because we do understand that there are triggers with DSA that add to the cost of the projects to meet ADA requirements. And how can Prop 39 money fund that and, you know, how that will be worked out.

MS. COLLOPY: The next question is on "On page 11, leveraging award funding, is there any consideration being given to requiring the LEAs to apply for utility incentives or at least partner up with a local utility to take advantage of the energy-efficiency resources available from the utilities?"

MS. SHIRAKH: Again, it's not a requirement. It's not a mandate. It's encouraged.

MS. COLLOPY: We're take a go-ahead in terms of questions from an Andrew Nalen (phonetic). I'm going to take you off mute, Andrew, and if you want to go ahead and state your question?

MR. NALEN: Sure thanks. Just a follow up to the question about the planning part of it, the cost guidelines, the question really was are those hard funding limits or are those just truly guidance? For smaller facilities an audit may end up costing you more than 20 cents per square foot. And if you can only go for 130 K, you know, but (inaudible) -- will never get to 130K if it's truly limited to 20 cents per GSF.

MS. SHIRAKH: Okay, thanks for that question because the way that I answered it was still kind of unclear.

These are our funding -- it’s my understanding that these are funding limits. And so it’s more than just guidance and direction.

But, so we’ll provide clarification if I’m understanding that incorrectly.

MR. NALEN: Okay.

MS. SHIRAKH: But, you know, typically through our Bright Schools Program, and that’s a program that’s been here at the Energy Commission for over 30 years we -- our audits fall within that, actually a little lower than 15 cents. So, we felt that the range of 15 cents per square foot was generous or would accommodate that.

I do understand that you have a remote site, a small site. There are additional costs, you know, to get to these hard-to-reach places. But these are some limits that we are putting out there for these various types of project identification vehicles.

MR. NALEN: Thank you.

MS. COLLOPY: And there’s a question about -- thank you.

There’s a question about when will this presentation be made available on our website?

We'll post this presentation on the website in the next day or two. We'll also put it over the list serve. So, again, sign up for the Prop 39 list serve and when we post this onto the website it will be triggered and you will be notified.

The next question is -- okay, hold on, we just have a lot of unmuting comments.

Okay, there's a question, "When we do the replacement will we have to replace the ceiling at the same time? Will Prop 39 pay for ceilings?"

MS. SHIRAKH: I'm quite sure I'm understanding that whole question. Maybe we can see if (inaudible) Ying is available to -- okay, we can unmute you, Ying, and maybe you could clarify that.

MS. YING: Can you hear me?

MS. SHIRAKH: Yes I can, thank you.

MS. YING: Okay, that's great. Okay, I missed the words of the lighting. If I replace the lighting, sometimes the ceilings go all over and we would replace the ceiling at the same time. So, the ceiling certainly is not an energy-efficiency related item, but can that be paid for it? Otherwise, we have to -- because reporting the expenditure would be pretty tedious.

MS. SHIRAKH: Yeah, it's probably not the answer you want to hear, but I think this is really geared towards specific energy equipment. And I do understand that you might have that, but it's really looking at the -- for lighting we're looking at lamp, ballast and fixtures, and not expanding that out to a whole ceiling replacement.

MS. COLLOPY: Did you have a follow up or -- Ying? Okay, thank you.

MS. SHIRAKH: Thank you.

MS. COLLOPY: The next question is "Can you explain how districts go about requesting planning and (inaudible) --?"

MS. SHIRAKH: Okay, so it's going to be a pretty simple request and that will be available through CDE's website. And we're just not going to see a lot of analysis. I don't think there's any analysis required to specify your request.

It's just following the funding limits in the guidelines and just saying how much you want.

MS. COLLOPY: "How do you monetize energy use around energy benefits in the SIR population?"

MS. SHIRAKH: I think we've addressed this. It is in the appendix, but it's 3 percent. And that is taken off of the -- it's the 3 percent taken off the cost of the energy project, so the actual -- that's how we're looking at the non-energy benefits. You know, I think it’s in Exhibit D, the actual formula. Exhibit E, the ratio calculation and the non-energy benefits, which is basically 3 percent of the project installation cost. And that’s the adder that we are considering.

MS. COLLOPY: All rightly, there is -- I think we’ve had this question before but there might have been too much static for Marie (phonetic) to hear this.

“Can an LEA install renewable energy before they do any efficiency measures if they meet the SIR and have considered all aspects of the program?”

MS. SHIRAKH: Yeah, so my response to that was you would need to -- in the certification section of the energy expenditure plan there will be a question that says what energy-efficiency measures have you done in your facility over the last X amount of years?

And that would provide, you know, kind of the justification for wanting to spend Prop 39 funding on solar, or renewable energy, you know, saying that you’ve met that requirement. You’ve done all the energy-efficiency you can.

And then the second part of my response to that question was that the SIR criteria, the cost-effectiveness criteria of the renewable project still needs to be met by those renewable project that you’re proposing in the expenditure plan.

MS. COLLOPY: Okay, we are getting down to the last half an hour, or 25 minutes. I just wanted to let you know we are taking all of your questions.

We are getting to the end of the questions and I want to thank Liz for hanging in there with all of her responses.

And if you do have questions, I just want to give you a last opportunity to key those into the chat. Alternatively, you can raise your hand, and we can unmute you, and you can ask your questions aloud. So, just trying to give you your 25-minute time mark.

Okay, we're going to move to the next question. "Our district needs replaces of HVAC at the school site and EMS for over $1.5 million. It is not feasible to break down the project for five years due to the cost effectiveness.

If the district pools various resources to fund the project at the beginning, will we be able to use Prop 39 money from the later years to pay back the borrowing either internally or through financing?"

MS. SHIRAKH: That's a very good question. I think -- I don't think I can answer that question here. It's an excellent question and we will definitely have a response for that.

I just don't want to misspeak because that's a very important question.

MS. COLLOPY: So, we'll be putting this on our Qs & As for sure.

The next question is "Can the reporting requirement be site-based, which would actually be meter-based, and the projects be anything from the site enterprise-wide?"

MS. SHIRAKH: Okay, so they are -- so, that first bullet on that page is site-based, so it would be your utility -- the energy usage.

So, say you have a school that has two meters, we would combine those two meters and showing all the electric use, and then all your natural gas use for that facility, and combining a site energy use for that 12 months after a project is installed.

So, I'm not sure, enterprise-wide? It would be the whole campus.

So, maybe some further clarification, you know, say you are doing an HVAC project in a building that has one meter, that your campus as two meters, we're still going to want to look at that whole campus because we're using that campus benchmark from pre-project installation.

Again, that's the first requirement for the energy savings reporting at the end of the project. And then you would go down one more level and report on the estimated savings of that unique measure or that project.

MS. COLLOPY: This is your question, Tom. I'm going to go ahead and take you off mute, if you have any follow-up questions to that answer?

TOM: Well, from my perspective, we're getting perhaps up here because a lot of the requirements you have are creating implementation challenges for me. And so, really, the intent of the question was I would re-lamp my whole district and I would be glad to report out the energy efficiency based on sites.

And again, there's a little bit of nuance there. I really think that the energy reporting has got to be meter based.

MS. SHIRAKH: Okay, thank you for your comments.

MS. COLLOPY: Thanks, Tom.

Okay, the next question is "If a project has an SIR greater than 1.05 and, therefore, not eligible for Prop 39 funds, can an LEA buy down their project so the SIR is equal to 1.05 and have at least some of the costs covered by Prop 39?"

MS. SHIRAKH: And it's a case on how that works. If you have an SIR greater than 1.05 that's fine, that means you're saving. You can even have an SIR of 4.1.

That just means you're saving $4 for every dollar you're investing, so that's awesome.

It gets problematic when you are saving one dollar -- or 1.05. So, if you have projects that are maybe .95 or .8, you can bundle those up with the other projects on that site, or on that school that have an SIR of, you know, larger, maybe 3.3, or 2.6. So, we're looking for that average to be 1.05 or higher.

I hope that clarifies that.

MS. COLLOPY: The next question is "How do LEAs provide documentation that data analytics have received prior technical evaluation?"

MS. SHIRAKH: Yeah, I think that's a repeat question and we'll be providing some clarification.

MS. COLLOPY: Okay. The next question is "Are there limitations to the number or quantity, use of Bright Schools Technical Assistance Programs by any one LEA?"

MS. SHIRAKH: Okay, so the Bright Schools Program has been available for, like I said earlier, about 30 years. And we have LEAs or schools that come in multiple times and that is still acceptable. The way we've dealt with this in the past and I'm sure we'll continue to do this, is if you -- you come into the Bright School Program and you implement the projects that were recommended in your audit, we welcome you to come back to the program.

So, for example, we've worked with Oakland Unified School District before and we've gone through the Bright Schools Program, Oakland Unified would be eligible to come in again. We're not penalizing any school, you know, that's been through our program before. They're welcome to come back through the program.

MS. COLLOPY: You may have answered this already. "May an LEA, doing SIR calculation use a portion of cost covered by a utility rebate or other sources, such as facility improvements?"

MS. SHIRAKH: Yeah, so in the calculation you take from the project costs, we do subtract the utility rebates or other grant funds.

If it's a match with a loan, for example, maybe you're putting in some of our ECAA loan, we're going to consider that in the project cost because that is a cost that the school district or the LEA will be responsible for repaying.

But, yes, we will be -- as part of the calculations we will be backing out any grant funds or rebate funds.

MS. COLLOPY: The next question is "Do potential rebates from utility companies count as a funding source for projects or are they considered a bonus that we can use on projects not included in our Prop 39?”

MS. SHIRAKH: Well, as I just described, it is backed out of the calculation and we’re encouraging it. And, yeah, it’s a bonus, your Prop 39 dollars will be stretched further.

MS. COLLOPY: The next question is about Public Resources Code 26240 which states that the SSPI (phonetic) will require LEAs to pay back funds if a project is torn down, or remodeled or if a property is deemed to be surplus and sold prior to the payback of the project. Can more specificity be provided on what this actually means?

MS. SHIRAKH: That is language from the SB 73. And so it’s quite a long question here. Let’s see, I think the real -- I guess the message behind this is that you really want to invest these dollars in a facility that’s going to be around. And, you know, it doesn’t make a lot of sense to invest a lot of money in a building that’s going to be demolished in two years, and so we’re trying to avoid that.

The intention behind this is to, you know, fix the existing buildings in California at our schools that are going to be around.

MS. COLLOPY: The next question is “Wouldn’t it be good to release drafts of the SIR calculators and other template forms for other comments?”

MS. SHIRAKH: Okay, thank you for that comment. We’ll consider that.

MS. COLLOPY: “Will LEAs be notified when they can start applying for planning funds or do we need to check the Energy Commission’s website?”

And I think we’ve covered that process.

MS. SHIRAKH: Yes. Just, again, make sure you sign up for the Prop 39 list serve through the Energy Commission’s website. And it’s very simple to do. There’s access that comes on every page on our website to sign up for a list serve. It has a drop-down menu. Please look for Prop 39 list serve and then just include your name and your e-mail address, and you will have all communique related to Prop 39 that we release to the public.

MS. COLLOPY: “Can LEAs provide energy-savings projects to both school sites and admin offices, CEOs and (inaudible) -- to admin facilities, too?”

MS. SHIRAKH: Yeah, there’s no restriction that it has to be a site on the LEA that’s only a classroom instruction. So, office, administrative offices are definitely eligible and sometimes actually have more opportunities because they're open year-round, where classrooms are only, you know, more of a nine-month facility. So, absolutely, they're eligible.

MS. COLLOPY: The next question is "If an energy project requires DSA review, is DSA approval required at the time of the expenditure plan submittal?"

MS. SHIRAKH: I don't think it's required. I believe we have certification that you will go through that certification process and we recognize that's a process, but it doesn't have to be done prior to the expenditure plan submittal.

MS. COLLOPY: The next question is "If an LEA has just completed a fluorescent light retrofit can they go to LEDs?"

MS. SHIRAKH: If it can meet the criteria. Again, though, if you've just replaced fluorescents and say you have 28-watt fluorescent lamps, you know, LEDS are great but they -- you know, they're so expensive. So, it might be cost-effective in a 24-hour facility. So, that might be harder to meet that cost-effectiveness criteria with the traditional operating hours of the school.

And so I think you just have to see how the cost-effectiveness comes out of that.

MS. COLLOPY: There's a clarifying question, "Is the planning funding award as currently in the guidelines only for the first year?”

MS. SHIRAKH: Yes, it’s only available this first year. The request is only available this first year. So, we’re going to have -- look for opportunities to ask for it. As I mentioned earlier in the presentation, the first requests will be available within the next week or two, followed by a second open period in January. And if we still hear that there’s a need for an open period, we’ll have one in the spring.

So, it’s just this first year that you can request this first-year funding for planning.

However, that planning funding can be used for this five-year period. So, you don’t necessarily have to spend it within the first year, it might roll over to years two and three as you’re going through that planning process.

MS. COLLOPY: So, Alice (phonetic), I’m going to take you off mute right now just to make sure that you have that question answered for you. So, the first year is when you get the planning funds. You can use those planning funds over the five years.

Are you there? You probably have us on mute because I see you talking.

ALICE: Hi, can you hear me?

MS. COLLOPY: Yes, we can.

ALICE: Thanks. The question was so the planning funding award will not be offered prior to each year, when we get a new award for the next, the following year, a portion of that won't be offered?

MS. SHIRAKH: That is correct. We really want to encourage LEAs to start that planning process now and to use this first-year funding plan out in the future. And so this is -- and we also really want the Prop 39 dollars to go to projects that are saving energy. And so having some limitation on the amount of the funds that go for planning and targeting -- you know, but having that allowed, but yet seeing years five -- two through five focused on energy project implementation.

ALICE: Okay. For those of us, then, who have done some preliminary screening and some energy audits, is the division between the 85 percent versus the 15 percent program assistance, whatever that is, it may be we need a little bit more flexibility in the energy planning activities allowed, and then the portion spent if it's going to be over the five years.

What we'll need and what our planning needs will be year to year to year.

MS. SHIRAKH: Okay, again, as Christine mentioned many times, Alice, if you want to formulize that comment in the docket process, that would be great.

MS. COLLOPY: Yeah, because then we can consider that for changes then.

ALICE: Thank you so much.

MS. SHIRAKH: Thanks, Alice.

MS. COLLOPY: All right, the next question is “Once an approved plan, energy conservation measures are installed, what is the anticipating funding release timeline?”

MS. SHIRAKH: Measures are installed and funding -- so, this is not a reimbursable program. It’s a money-up-front program. So, when you submit your expenditure plan to the California Energy Commission we’ll be reviewing and approving that plan, and letting the LEAs know, and also letting CDE know.

Then CDE will be cutting the checks through their Controller’s Office and that process, and so you’ll bet getting the funding in advance of actually doing your project.

I guess to what’s the anticipated release timeline, it’s my understanding that CDE will be batching those requests on a quarterly basis, and will be releasing money to the LEAs that have approved expenditure plan each quarter. So, again, maybe that’s further clarification on that question.

MS. COLLOPY: The next question is “If one year one plan’s project receives the first-year funding award, can we fund the remainder of the project with subsequent years’ funding?”

MS. SHIRAKH: That kind of falls in the same category as the question we had earlier on paying for a project and then kind of reimbursing yourselves. So, I think I’m going to group this question in with that question.

Because I just don’t -- you know, I think this is a -- I don’t know quite how to answer that. I think it’s possible but I just don’t want to mislead.

MS. COLLOPY: So, that is something that we are going to look into further and then post on our Qs & As.

The next question is “Who do we send all this stuff to for initial planning activity funds, to do the benchmarking, and you said October, so when is the deadline for funds to be released in November, or can be sent the request any time during the month of October?”

MS. SHIRAKH: Yeah, so those parameters will be -- those directions will be given to you by CDE. But it’s my understanding that they’ll have like a month window, because we’re getting into October maybe that will go into November a little bit, but you’ll have a month to request those.

So, again, you'll be seeing that information soon from CDE and it's my understanding it's a very simple process.

MS. COLLOPY: I have a question, Liz. The California Department of Education is our partner in this program. Do they also have like a list serve process or do we take information from them and give it to our stakeholders through our list serve process?

MS. SHIRAKH: The Energy Commission is the holder of all these questions. CDE does have a "frequently asked questions" on their website. I'm remiss for not having that available here.

But the Energy Commission's Prop 39 webpage is the main information source for these questions and answers.

MS. COLLOPY: Okay, great.

MS. SHIRAKH: I thank you for asking that.

MS. COLLOPY: I have a question, a comment -- okay, thank you.

"Are LEAs prohibited from using future year allocations for planning?"

MS. SHIRAKH: Yeah, I think we've answered that.

MS. COLLOPY: "Can any portion of funding received for planning activities in year one be applied for subsequent years? For example, the money for an assistant?"

MS. SHIRAKH: Yes, you can.

MS. COLLOPY: And, again, "The planning money for year one, you can use the planning money over the five years?"

MS. SHIRAKH: Yes.

MS. COLLOPY: Oh, someone was asking that they attended today's webinar and was there any value that we saw in also participating in an in-person meeting that's not by webinar?

It's the same information, right?

MS. SHIRAKH: It's the same information, the same presentation, and the same format. We'll have questions and answers afterwards. And various staff people are doing these, so it's not necessarily going to be Christine and I at each and every one of these.

But the format is the same, the process of submitting your questions to the docket process is exactly the same. So, it's really your choice. If there's one in your local area and you want to pop in, feel free to.

The Energy Commission also has two more webinars, I believe, scheduled. We have one next Wednesday, on October 16th. And then on October 22nd, it's Tuesday, that's going to be run here at the Energy

Commission, a meeting, and that is also going to be a webinar, a WebEx. So, there's two more opportunities to participate via the WebEx venue.

MS. COLLOPY: So, we have another question about "Can you expand upon the types of activities an LEA may expend planning funds in Prop 39 program assistance? This is found on page 10. These give a range of examples of coordinators, administrators, et cetera."

MS. SHIRAKH: So, you know, these -- maybe a further clarification, these funds could be used for staff, LEA staff doing this work. This could be third-party consultants that you hire.

So, there's not a restriction on who would be doing this.

As far as further clarification, it's really Prop 39 program assistance is just a label for the categories that are described in the activity and like we've talked about. The main component of the program is that it requires data from the utility companies, the release forms, getting all your meters numbered, the location of those meters, you might need help with that. The benchmarking, you might need help with that.

As Alice brought up, reporting might be something that we need to add to that list. I think it's kind of implied because it is a Prop 39 requirement and anything Prop 39 related would fit under that.

So, you know, maybe we need to further clarify this and add some additional information because like it’s definitely a repeat question that’s coming up, so that is an indicator that there needs to be more clarity.

MS. COLLOPY: The next question is “Can energy savings behavioral interventions be included in the SIR calculations, such as feedback on energy usage or training, and prompts for energy conserving, operating, and maintenance habits? And so, would MNV (phonetic) results of such efforts in similar facilities serve as adequate documentation?”

MS. SHIRAKH: Yeah, right now I don’t -- there isn’t that behavior intervention adder or benefit added for part of the calculation. I think the non-energy benefits have -- you know, we’ve tried to address that through the 3 percent adder on there. But no, that is not really built into the calculations.

MS. COLLOPY: Okay, folks, we are down to the last five minutes of the webinar and we are actually down to the last two questions, as well. So, I’d like to thank those of you who are still on the call for hanging in there on the call.

The next question is “CEC recently released a funding deadline for two-year grants. Please explain the difference between this funding and the upcoming available funding."

MS. SHIRAKH: Okay, good question. This is such a new program. The funding, the two-year grant deadline that was advertised in August was for the smaller LEAs that were in Tier 1 and Tier 2. They could request bundled allocation, meaning that for this fiscal year they could request the first and second year of this five-year program, and get that money now.

So, for example, if you were in Tier 1 and you had an allocation of $15,000 for year one and $15,000 for year two, you would get $30,000 this year allocation.

And so when these funding awards are released in the next week or so, say a school -- school district ABC put in for that two-year bundle, you're going to see that their allocation is going to be that two-year figure.

So, I hope that clarifies it. It was just an opportunity see which LEAs wanted to have that combined two-year because that affected the allocations of everyone else.

And then next year, just as an adder, if you have requested that two-year funding, next year you wouldn’t be receiving funding because you’ve already received it this year.

MS. COLLOPY: A question, I think we’ve answered this a few times, “Can energy planning funds be spent on an energy manager?”

MS. SHIRAKH: And again, right now, as it currently reads it’s no, it would be a separate request. However, the activities that are spelled out, you know, under the Prop 39 program assistance are a lot of the same type of activities. So, it is a separate category.

MS. COLLOPY: The next question is “Can Prop 39 be used to cover wiring costs associated with re-fixturing?”

MS. SHIRAKH: So, I’m going to assume you’re talking about wiring of lamps or lighting fixtures when you say re-fixturing, so I would imagine wiring would be a legitimate cost of doing a retrofit project, a lighting retrofit project.

MS. COLLOPY: The next question is -- so Jose Heccio (phonetic), Jose, I’m going take you off mute, if I can find you. I’m taking you off mute so you can ask your question because it sounds as if we did not answer your question effectively. So, Jose --

JOSE: Can you hear me?

MS. COLLOPY: Yeah, hi Jose.

JOSE: Hi. Yeah, my question was, I guess I made a statement, I asked the question earlier. My question is if you have a project (inaudible) that has an SIR lower than 1.05 then the question is can a school district buy down the project so that the SIR meets the Prop 39 requirement?

MS. SHIRAKH: See, I haven’t had that discussion. We really -- I think at this point in time I’d have to answer no, that we really want to see that -- it’s a pretty set, you know, line in the sand that it has to have that minimum SIR requirement. And there hasn’t been any discussions about, you know, filling it in with other funding sources.

Again, I would just try to encourage -- you know, we’ve done a lot of testing of various energy efficiency projects that we’ve seen come through our programs, and as part of these SIR calculators as we’re developing them. And we feel that that’s a pretty good target. It’s actually a pretty generous target, and that most energy-efficiency projects, especially if you’re bundling them together should make it.

Obviously, if you’ve done a lot of lighting projects and a lot of that low-hanging fruit as some of the school districts, you know, LEAs have done, and you have this old boiler that needs to be replaced or something like that, that's going to be a little bit more problematic and challenging.

But we are looking at this as a bundle, a bundled package.

MS. COLLOPY: Does that answer your question, Jose?

JOSE: Yes, it does. Thank you.

MS. COLLOPY: Thank you.

MS. SHIRAKH: Thanks, Jose.

MS. COLLOPY: Okay, we are getting to the tail end here. I know we have touched all the points, thank you for hanging in there.

"Since this is advanced funding how do we deal with project overruns and change orders?"

MS. SHIRAKH: So, there is a section in here that talks about that and we have some triggers because we do recognize that projects -- it's not -- it's very common. I'm trying to get to the specific page. Page 28.

So, for example, if a project costs increase by more than 15 percent, that would trigger you having to contact the Energy Commission, and let us know, as looking at that expenditure plan and kind of -- because these do have to be cost-effective.

So, please look on page 28, you have five bullets that kind of trigger the need to reassess an expenditure plan.

MS. COLLOPY: Okay, I’m going to take Steven Cole (phonetic) off mute right now. Steven, I know you have some questions about your facility.

Steven? Take us off mute for you, perhaps. There we go. Steven?

Okay, we’re on mute on your phone. We heard you for a brief second. Okay, Steven, are you there? Steven?

Okay, we’re going to have to go ahead and put you back on mute. So, we will follow up with you. I have your phone number and we will follow up with you.

“On page 41 of Appendix D, I see the priority one project example for providing energy efficiency where this project didn’t include the behavior modifications.

Thank you for recognizing the behavior of these programs can result in substantial savings, maybe 10 percent.

May we put forth clarification of parameters for this type of operational efficiency project?”

MS. SHIRAKH: Yeah, I can’t really provide that clarification right now, but I will --

MS. COLLOPY: So, I’m hoping that you can hear that response because we're getting a little bit of feedback. So, thanks for your comment.

Okay, we are down to the last question. Actually, that was our last question.

So, thank you all so much for your wonderful questions. We will be addressing the questions on the Q&A.

I will turn this over to Liz to go ahead and close out our webinar today. But thank you for your patience with our technical difficulties and for all of your great questions.

MS. SHIRAKH: Yeah, and I'd just like to chime in and say the same thing. Thanks so much. This was a three-hour meeting, it's kind of taxing doing it by phone, and I apologize for some of the feedback we had on the audio part at the beginning, but I think it went well. Hopefully, it was as clear on your end as it was on ours.

So, thanks again everyone for participating and we look forward to seeing any -- you know, your comments through the docket process.

MS. COLLOPY: Thank you so much.

MS. SHIRAKH: Bye-bye.

(Thereupon, the Webinar was adjourned.)

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