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*StopWaste.Org is the Alameda County Waste Management Authority & the Alameda County Source Reduction and Recycling Board operating as one public agency.*

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August 5, 2009

California Energy Commission  
Dockets Office, MS-4  
**RE: Docket No. 09-OII-01**  
1516 Ninth Street  
Sacramento, CA 95814-5512

To Whom It May Concern:

Thank you for the opportunity to provide comments on the **ARRA SEP Guidelines**. We appreciate staff's commitment and the time that was spent on this daunting task. The preliminary guidelines are comprehensive, thorough and very well thought through. Our comments:

1. Please consider allowing matching funds that are less than equal for the AB 811-type programs, e.g. 50%. Does a county need to match the funds received as an unincorporated entity? If so, for a "small" county, the EECBG funding received is very limited. The overhead and start-up costs for creating a financing district are the same regardless of the county size.
2. Under Municipal Financing District Program Structure (p. 21) – in order for the program to be considered for SEP funds, applicants must be willing to match SEP funds with EECBG funding. In the CEC Staff Draft of Block Grant Guidelines (Formula-Based) dated July 31, 2009 – there is a requirement for a cost-effectiveness feasibility study (p. 7) for the use of block grant funds. It's not likely that a Municipal Financing District will rank high according to this criteria. How would you propose to reconcile these requirements? We would like to see small cities and counties encouraged to participate in regional initiatives such as AB 811- type financing district.
3. In addition, we believe that funding for the Comprehensive Residential Building Retrofit Program need to be restricted to local government consortia, as currently proposed. Opening it up to private/non-profit entities may create a competitive disadvantage, especially when local governments are experiencing reductions in force (limited staff resources).

Thank you again for the opportunity to comment.

Sincerely,

Wendy Sommer  
Senior Program Manager

**DOCKET**

**09-OII-1**

DATE 8/5/2009

RECD. 8/5/2009