

**Docket Optical System - Comments on State Energy Program Guidelines**

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**Date:** 8/5/2009 4:29 PM  
**Subject:** Comments on State Energy Program Guidelines  
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The following comments are submitted regarding the State Energy Program Guidelines. These comments augment the oral comments made by Craig Keys of the Green Valley Initiative at the San Diego workshop.

The following language should be in substitution of the language on page 42, under Evaluation Criteria.

## 2. Job Creation

The Energy Commission strongly encourages applicants to compete on the basis of job creation. In doing so, proposals should take into account the type and number of jobs created and the wages earned in light of the needs of the applicant's local economy for entry level, semi-skilled and highly-skilled job opportunities.

Job estimates shall be consistent with the Council of Economic Advisors Estimates of Job Creation for the American Recovery and Reinvestment Act of 2009, in that the estimates shall include the following categories of jobs created: Direct Jobs, Indirect Jobs, and Induced Jobs. The total number of jobs created will be an important part of the evaluation, using the dollars per job created as a vital metric.

If the Council of Economic Advisors method is used, then the total investment in the program shall be divided by \$92,000 per job-year to estimate the number of jobs created.

If the Council of Economic Advisors method is not used, then any other job creation figures must be accompanied by a complete and cogent analysis of the methods used to estimate job creation.

The total investment should include SEP funding and all matching funds. Actual job creation information will be required to be reported as the projects progress.

We also suggest that this first paragraph (above) should also be inserted in the Preliminary State Energy Program Guidelines as an additional sentence at the end of the first partial paragraph on page 6, following the sentence that ends "...\$20 million for this purpose."

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