

BEFORE THE CALIFORNIA ENERGY COMMISSION

In the matter of,)
)
Proposition 39 - California Clean Energy Jobs)
Act)
_____)

Docket No. 2013-CCEJA-01

SOUTHERN CALIFORNIA EDISON COMPANY'S COMMENTS ON THE
PROPOSITION 39 CALIFORNIA CLEAN ENERGY JOBS ACT PRE-RULEMAKING

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**SOUTHERN CALIFORNIA EDISON COMPANY’S COMMENTS ON THE
PROPOSITION 39 CALIFORNIA CLEAN ENERGY JOBS ACT PRE-RULEMAKING**

Southern California Edison Company (“SCE”) respectfully offers these comments on the California Energy Commission (“CEC”) staff’s Proposition 39: California Clean Energy Jobs Act- 2013 Program Implementation Guidelines (“Guidelines”), Revision 2, dated October 2013, in response to the CEC Media Advisory entitled “Energy Commission Announces Proposition 39 Draft Guideline Meetings: Public Comments Sought on Draft Guidelines for School Energy Projects,” dated October 1, 2013.¹ SCE looks forward to the launch of the State’s landmark Proposition 39 (“Prop 39”) Program, which will offer significant financial, technical, and workforce education support to kindergarten through twelfth grade (K-12) schools and community colleges to implement energy efficiency and clean energy projects. SCE and other stakeholders, including the other investor-owned utilities (“IOU”), publically owned/municipal utilities, and the California Public Utilities Commission (“CPUC”), have been working with the CEC to ensure IOU programs can effectively complement the Prop 39 Program, and support a

¹ The Media Advisory is available at http://energy.ca.gov/releases/2013_releases/2013-10-01_prop39_meetings_rev_ma.html [as of October 25, 2013].

streamlined, efficient, and comprehensive suite of programs to implement cost-effective and comprehensive projects, while supporting clean energy job creation and workforce education. SCE generally supports the Guidelines as proposed, except where its comments herein provide suggested modifications to the Guidelines to promote a simple, successful process for schools participating in both Prop 39 Program and IOU/utility programs.

A. “No Touch” Audits

The Guidelines require local educational agencies (LEA) to complete an energy survey, an ASHRAE level 2 energy audit, or data analytics to identify and prioritize energy projects.² The Guidelines describe data analytics as a “no touch” energy audit assessment that evaluates a facility’s energy usage based on metered data, and other data such as digital photographs, and provides a report with project recommendations without entering the facility.³ The Guidelines also require schools to provide documentation of prior technical validation of this technology by a local utility to qualify for Prop 39 award funds.⁴ SCE supports the concept of “no touch” audits and currently offers this type of audit in a limited capacity through its third party “Cool Schools” Program, and is exploring potential expansion of this innovative audit offering. However, SCE does not widely offer this type of audit in all programs that schools and universities may participate in, and thus cannot provide “no touch” audit validation for all customers. As such, SCE recommends modifying the Guideline language on p. 18 to state:

“In order to expend Proposition 39 award funds for these data analytics, an LEA must provide documentation ~~of prior technical validation of the technology by~~ of this type of audit from a local utility, if and to the extent the LEA’s respective utility offers “no touch” audits.”⁵

² Guidelines, p. 17.

³ Guidelines, p. 18.

⁴ Guidelines, p. 18.

⁵ Guidelines, p. 18 [strikethrough portion deleted and underlined portion added].

B. Workforce Education & Training

The Guidelines note the California Conservation Corps has the option to “...extend this learning opportunity to schools by connecting with service learning, science classes, environmental clubs or career academy programs.”⁶ SCE believes that the opportunity to connect Prop 39 activities to students through service learning, science classes, and related activities is a key opportunity to educate the future workforce and should not be missed. As such, SCE recommends that the connection to learning opportunities be included as a requirement in the Guidelines. Specific areas of the Guidelines that could be augmented include:

- Benchmarking or Energy Rating System⁷
 - Sample opportunities – Learning about benchmarking and its importance, skills required, related careers
- Energy Surveys⁸
 - Sample opportunities – Learning about why energy efficiency, importance of the audits, how to conduct an audit, skills required, related careers

This expansion leverages the work already taking place with the Prop 39 Program, and can work in concert with the IOUs’ statewide WE&T Program.

The Guidelines also outline the process schools are required to undertake to receive K-12 energy project award funding, including Energy Project Prioritization Considerations (Step 3), which include specific factors each LEA must take into account when prioritizing projects.⁹ Item 11 on this list addresses the ability of the project to enhance workforce development and employment opportunities and/or accommodate learning opportunities for school pupils or at-

⁶ Guidelines, p. 32.

⁷ Guidelines, p. 13, Step 2.

⁸ Guidelines, p. 17, Step 5, Option 1.

⁹ Guidelines, p. 12.

risk youth in the community.¹⁰ SCE recommends modifying the Guidelines to clearly state that this consideration refers specifically to *clean jobs*, as opposed to general workforce education and training, which is consistent with other considerations included in the Guidelines.

C. Energy Savings Reporting

The Guidelines require participating LEAs to report both site-level and project level energy savings.¹¹ For project level savings, the Guidelines allow LEAs to report savings using four methods, including option A, “Utility Incentive Completion Report.” It should be noted that this option is only applicable for a small portion of rebated utility projects, as only applications with more complex projects include initial energy savings estimates. SCE recommends the following modifications to the Guidelines, at p.26:

“Utility Incentive Completion Report. For complex energy efficiency projects that receive utility incentive, and that execute an IOU release (see page 12 &13 of the Guidelines), the M&V requirements of the utilities can be used to determine the actual energy savings. Note that only a small portion of rebated projects, typically complex or new measures, will be able to use this option.”¹²

D. Conclusion

SCE appreciates the opportunity to participate in the CEC’s process, and looks forward to the launch of the Prop 39 Programs. SCE urges the CEC to consider the recommendations described herein to promote a seamless and successful process for California’s K-12 schools and Community Colleges.

¹⁰ Guidelines, p. 15.

¹¹ Guidelines, pp. 25-26.

¹² Guidelines, p. 26 [strikethrough portion deleted and underlined portion added].

Respectfully submitted,

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