

Energy - Docket Optical System

From: Energy - Prop39
Sent: Friday, October 25, 2013 4:55 PM
To: Energy - Docket Optical System
Cc: TAndreoni@cmua.org
Subject: FW: Proposition 39 Comment - CMUA's Comments on the Draft Proposition 39 Guidelines for K-12 Schools, 13-CCEJA-1

Thank you for your comments. They have been forwarded to the Docket to be logged in for consideration.

From: Tony Andreoni [mailto:TAndreoni@cmua.org]
Sent: Friday, October 25, 2013 4:51 PM
To: Energy - Prop39
Subject: Proposition 39 Comment - CMUA's Comments on the Draft Proposition 39 Guidelines for K-12 Schools

Date: October 25, 2013

Re: CMUA's Comments on the Draft Proposition 39 Guidelines for K-12 Schools

The California Municipal Utilities Association (CMUA) appreciates the opportunity to submit written comments on the draft *Proposition 39: California Clean Energy Jobs Act – 2013 Program Implementation Guidelines* (Proposition 39 Guidelines). CMUA represents the majority of publicly owned electric utilities in the state and many wholesale and retail public water agencies that serve more than half of California's population.

First, CMUA appreciates the number of outreach events (workshops and webinars) that the CEC staff has had on the draft Proposition 39 guidelines – this should serve as a model for other CEC regulatory and non-regulatory efforts with all stakeholders.

Our members are interested in many of the responses that CEC may have to the questions raised at all of the workshops/webinars. Our comments/questions below are focusing on overarching concerns or clarifications that many of our members seek. I do expect that some of our individual utility members, including SCPPA and NCPA, will be submitting their list of concerns. We do request that all questions posed that have not been answered in writing yet be provided on CEC's website to help respond to our members' concerns. We would also suggest that the list of CEC questions and responses be continually updated for the duration of the Proposition 39 program.

- CMUA supports that the CEC staff consider an approved list – or basic energy efficiency guidelines used to help schools choose high-quality improvements. This may include an expedited list of all potential energy efficiency projects that a K-12 school may want to consider for funding under Proposition 39, helping to reduce the total energy consumed by K-12 schools. Furthermore, all possible energy efficiency improvements/measures should be considered by individual schools, or by school districts, before considering the installation of major renewable energy systems.

- Our members are working closely with many of the school districts and/or schools to help provide 12 months of the past year’s energy data and can help schools in establishing an energy savings plan. Individual data release forms have in some cases been developed by individual public utilities. We seek clarification on how CEC data release forms will be established so our members can provide energy data to the CEC, and also need clarification on the need for energy data from schools not currently participating in the Proposition 39 program. Providing data on schools not participating in the program will place an additional burden on our public utilities. We do have suggestions on the energy data reporting frequency. To simplify the transfer of 12 months of energy data, CMUA suggests that monthly data be provided to schools and to the CEC. Furthermore, our members have pointed out, that in some cases 15-minute or even 60-minute interval data may not be achievable if the utility meter installed at a given school provides only a flat billing demand figure and total kilowatt hours consumed for a 30-day billing period. In these cases, monthly energy use data versus incremental data (15-minute interval) provides the best compromise.
- It was mentioned in the October 9th, 2013, CEC presentation (on page 6) that the Cost-Effectiveness Determination (Savings to Investment Ratio) on-line calculator will not be available until December, after the guidance is adopted by the CEC. CMUA members would like to review the calculator for accuracy and evaluate its overall use.
- Our members are participating in multiple public benefits programs to fund and also account for annual energy efficiency, renewable energy, demand response, and low-income assistance programs. This is typically reported annually to the CEC under SB 1037 & AB 2227. As our members work with school districts and individual schools to provide data and help improve energy usage, CMUA suggests that the accounting or credit for the energy efficiency improvements be part of the annual SB 1037 reports to the CEC, aside from the Local Education Agency (LEA) reports to the CEC. Furthermore, many of our public utilities have resources to assist schools in managing their energy improvements.
- Please clarify or confirm that the CEC will allow utilities to account for all of the energy efficiency savings from schools based on existing building conditions and technologies being used.

We look forward to working with the CEC on the next version of the Proposition 39 guidance and in implementing this program.

--Anthony

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