



Santa Monica Malibu Schools

December 5, 2013

California Energy Commission

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Dear Chair Weisenmiller and Commissioner McAllister,

On behalf of the Santa Monica-Malibu Unified School District, I am writing to comment on the draft Proposition 39 Guidelines released on November 19th, 2013. I am concerned that we who, as districts, have already invested heavily in energy usage reduction strategies may not be able to put together projects that meet the 1.05 SIR threshold outlines in the 11/19/13 draft. For example, my District has implemented Solar Photovoltaic projects at 9 elementary facilities, replaced hot water boilers, upgraded to T8 lighting and have implemented other energy saving initiatives. As a result, in benchmarking the energy intensity of our facilities, we are significantly lower than our peer group (using the Lawrence Berkeley Lab's EnergyIQ tool). Further exacerbating the issue is the fact that we are a coastal community and experience moderate temperatures year round, showing lower utility usage as heating and air conditioning are not used to the extent of other non-coastal communities. One suggestion for addressing this issue is to provide an exception process regarding the 1.05 SIR for those Districts that meet certain criteria; for example:

- a) Districts that can demonstrate energy intensity some percent below their peers *IN LIKE COMMUNITIES*
- b) District's whose underlying energy tariffs are some percent below statewide averages.

We look forward to moving forward with our Proposition 39 projects and hope that will consider these and any other changes that promote the effective implementation of this important program.

Sincerely,

Virginia I. Hyatt
Purchasing Director
Sustainability Coordinator

Santa Monica-Malibu Unified School District

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