

# Ceres Unified School District

*“Committed to Excellence, Responsive to Every Student”*

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California Energy Commission

**DOCKETED**

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December 2, 2013

Chair Robert Weisenmiller  
California Energy Commission  
1516 Ninth Street, MS-33  
Sacramento, CA 95814

Dear Chair Weisenmiller:

On behalf of the Ceres Unified School District, I am writing to comment on the draft Proposition 39 Guidelines released on November 19, 2013. I am concerned that local education agencies who have already invested heavily in energy usage reduction strategies may not be able to put together projects that meet the 1.05 SIR threshold outlined in the 11/19/13 draft. For example, my district has implemented comprehensive demand reduction strategies through education and data feedback with our teachers, staff and students. We have also recently installed HVAC controls at all of our facilities. 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 purchase our electricity from a municipal utility with relatively low rates, and we purchase our natural gas through SPURR, a wholesale provider that offers a significant discount on these costs. This reduces the "NPV" calculation in the SIR numerator which will likely further erode our ability to achieve a 1.05 SIR with our Proposition 39 Expenditure Plan.

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
- 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 you will consider these and any other changes that promote the effective implementation of this important program.

Sincerely,



Scott Siegel, Ed.D.  
Superintendent

