

Energy - Docket Optical System

From: Smith, Marcia@Energy
Sent: Wednesday, August 06, 2014 10:04 AM
To: Energy - Docket Optical System
Subject: Docket 13-CCEJA-0: Comments on Prop 39 FW: Proposition 39 Guideline Revision

From: Larrieu, MaryAnn [<mailto:MaryAnn.Larrieu@ouhsd.k12.ca.us>]
Sent: Monday, August 04, 2014 3:15 PM
To: Smith, Marcia@Energy
Cc: McFarland, Stephen; Dickinson, Steve
Subject: Proposition 39 Guideline Revision

California Energy Commission

DOCKETED

13-CCEJA-01

TN 72573

AUG 06 2014

Good afternoon Marcia,

Oxnard Union High School District is not able to qualify any measures for Proposition 39 funding under the current guidelines. This is due to existing on-site solar generation at our schools. At one school site, we produce 107% of its annual electricity consumption. The annual electricity bill is \$54,186, and the net consumption of billed and onsite generation is 1,896,359 kWh, for an average unit cost of \$0.03 per kWh. This makes the SIR of 1.05 impossible to achieve under current guidelines.

The Superintendent, School Board, CBO, and I are eager to work with the CEC to resolve this matter as quickly as possible. In fact, some of us would be available to travel to Sacramento to have a conversation about this with the appropriate Commissioner, and see if we can help the CEC in your efforts to make this funding available to all school districts in an equitable manner. I maintain a detailed database tracking utility billing, on-site generation, and net consumption of electricity, which we would be happy to share with you. If we were permitted to value solar generation using the average unit cost of electricity at meters prior to installation of our PV arrays, and track net consumption, I feel that the SIR of 1.05 could be met.

We don't believe that we should be penalized for being early adopters of PV generation at our schools. We should be applauded for demonstrating social responsibility and for our forward thinking Board. We would welcome the opportunity to be a part of the solution by working in collaboration with the CEC. Our 2013-14 Prop 39 allocation is over \$728,000, and we are unable to access any of it, or future allocations at this time.

Can you please let me know which of the Commissioners I should approach to continue this conversation?

Thank you so much.

Respectfully,

**Mary Ann Larrieu, BOC Level 1 Building Engineer
Energy Conservation Specialist**



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Oxnard Union High School District is proud to be recognized by the U.S. Environmental Protection Agency with ENERGY STAR building certifications.