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California Energy Commission

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OCT 27 2014

October 24, 2014

Dear Energy Commission Members and Staff:

I respectfully request that you allow Oxnard Union High School District access to Proposition 39 funding. The specific issue is the Prop. 39 Guidelines require achieving a Savings-to-Investment ratio of 1.05 using annual billed electricity and consumption. However, the following points show why Oxnard Union High School District has a unique situation that should be taken into consideration with the Savings-to-Investment ratio calculations:

- Due to existing photovoltaic generation at all six OUHSD High Schools, and an aggressive energy conservation program, our annual electricity bills for a high school campus of over 250,000 square feet is only \$47,000. The annual billed consumption is negative 163,510 kWh, with an average peak demand of 357 KW. The Savings-to-Investment Ratio of 1.05 is impossible to attain, with negative consumption numbers.
- The photovoltaic installations that generate electricity were certainly not free. We have proposed three viable alternative methods for valuing electricity consumed at our sites, and the California Energy Commission has rejected all of them, and provided no alternate means of accessing our Proposition 39 funding allocation.
- As more schools install onsite renewables, the question of how to fairly value subsequent energy efficiency measures will need to be addressed.
- Oxnard Union High School District was allotted \$728,647 for energy efficiency projects in 2013-14, but is unable to access any of this funding due to the Guidelines in their present form.

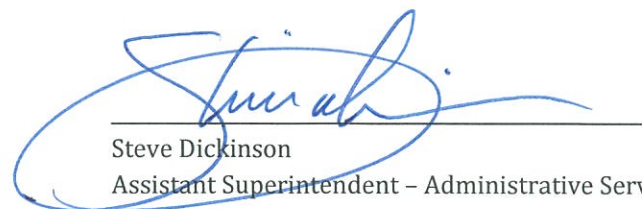
For these reasons, I respectfully ask that Oxnard Union High School District be permitted to participate in Prop. 39 in the same manner as Local Educational Agencies that do not have existing onsite solar generation. We believe that OUHSD should be able to access Prop 39 funding under a more equitable set of rules. We should be applauded, not penalized for being early adopters of PV technology. We are doing more than our fair share in reducing demand to the grid. And we are providing living classrooms with curriculum for our students to learn about this rapidly changing technology, and providing career pathways through our Green Technology Academies.

I strongly urge the California Energy Commission, as the lead agency in Proposition 39 implementation to work with Local Educational Agencies to approve alternate methods of calculating "cost effectiveness" so that all school districts will have equal opportunity to access this funding for badly needed upgrades to HVAC and lighting efficiency projects.

Sincerely,



Gabe Soumakian, Ed. D.
Superintendent



Steve Dickinson
Assistant Superintendent - Administrative Services