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From: Larrieu, MaryAnn [MaryAnn.Larrieu@ouhsd.k12.ca.us]
Sent: Monday, December 08, 2014 2:28 PM
To: Energy - Docket Optical System
Subject: Docket 13-CCEJA-0: Comments on Prop 39

California Energy Commission

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Categories: Ready to Docket

Due to current restrictions imposed on Proposition 39 funding, Oxnard Union High School District is unable access funding for our schools. We are leaders in renewable energy, having installed expansive solar arrays at all six comprehensive high schools prior to December 19, 2013. We were pleased to see the proposed substantive changes to the Guidelines provide a SIR Alternative for Zero Net Energy LEA's. However, this is too restrictive because it requires each site to have zero dollar utility bills or a positive bill credit from excess energy generation. We only have one school site in this category. The other comprehensive school sites supply the majority of their electricity consumption with onsite renewable energy, but not all. I respectfully recommend the following change of wording to page D-3 of the proposed Guidelines:

SIR Alternative for Existing Renewable Generating LEAs: *If prior to December 19, 2013, each comprehensive school within an LEA had clean energy generation, the LEA may consider submitting an energy expenditure plan with eligible energy projects using an SIR alternative process described below.*

LEAs shall submit a narrative describing the facility(ies) background(s), the clean energy generation project(s) and the energy saving information which demonstrates how the proposed eligible energy measures meet the Public Resources Code 26206 (c) "All projects shall be cost effective: total benefits shall be greater than project costs over time." The LEA must describe its methodology for determining cost effectiveness and explain how it complies with this Public Resources Code section.

We appreciate the CEC's responsiveness thus far, and with this additional modification to the Guidelines, we may be able to access this badly needed funding. Our schools are in desperate need of energy efficient upgrades to lighting and HVAC systems. We have been proactive in communicating with several top officials at the CEC, actively participating in one of the public meetings, and would deeply appreciate an equitable resolution to this dilemma. We had to put our Bright Schools technical assistance grant on hold, because we didn't want to waste valuable resources and time. We are able to participate in ratepayer-funded energy efficiency programs administered by the CPUC, but we are not able to meet the California Energy Commission's SIR calculations.

I urge the California Energy Commission to make this modification to the Guidelines at the December 10, 2014 meeting so that Oxnard Union High School District does not miss out on a second year of this valuable program. Thank you so much for your time and consideration. We greatly appreciate the ability to share our concerns with you.

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.