MENDOCINO COUNTY OFFICE OF EDUCATION

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California Energy Commssion

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Energy Commissions Public Advisor

California Energy Commission

1516 Ninth Street

Sacramento, CA 95815

Docket Number 13-CCEJA-1 "Comments on Prop 39"

Dear Commissioners:

Thank you for the opportunity to comment on the draft Proposition 39 Guidelines. As a County Office of Education representing rural districts, the single most important comment we would like to make is to minimize the administrative cost to small LEA's in the state to access the Proposition 39 funding.

- We request simplicity in the application and reporting process.

A quick review of the CDE's entitlement spreadsheet reveals that of the 2,012 eligible LEA's, over 68% have 1000 or fewer ADA. Over 11% are micro-LEA's with 100 or fewer ADA! These small LEA's have limited staff and huge existing deadlines and reporting requirements in addition to providing educational support for their teachers. The complicated application process in the proposed Guidelines will delay project submission and implementation and thus job creation and energy benefits to this huge proportion of our State's LEA's. The quarterly reporting requirement places an additional unnecessary burden on these small schools and their correspondingly small projects. Ultimately, in order to receive some funds and energy benefits, many will be forced to spend portions of their funding hiring extra help, possibly consultants, to handle the paperwork, thus reducing the true effectiveness of their already small allocations.

- Regional Approach

Small LEA's within an area or even regional should be allowed to submit a combined application and project plan that meets the program requirements. This consortium approach could achieve better economies of scale in both the administrative and purchasing/construction project costs.

- Streamline the process for small LEAs with simple projects that have proven results.

The time delays noted in the guidelines do not include design and potential DSA or local permit review delays. Given the complex nature of the application and approval process, many LEA's may delay design documents until they have CEC approval of their plans, further delaying economic stimulation and energy cost reduction. A simple application process that automatically approves

strategies like those listed in Appendix B would greatly streamline the process and allow small LEAs to move forward quickly.

- Rural areas rely on fuel sources other than traditional utilities.

Many rural schools use propane and fuel oil to heat their buildings. How will the requirement for direct utility cost and consumption reporting to the CEC managed for schools using propane and fuel oil?

Thank you for your efforts to reduce energy costs for schools and create jobs. We believe that reducing the administrative costs of this program, especially to small LEA's, will increase our success in reaching these goals.

Sincerely,

Paul Tichinin
Mendocino County Superintendent of Schools