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California Energy Commission
DOCKETED
13-CCEJA-01
TN 72074
OCT. 15 2013

October 14, 2013

California Energy Commission, Efficiency Division
Local Assistance and Financing Office, MS-23
1516 Ninth Street
Sacramento, CA 95814

SUBJECT: Comments on Proposition 39 Guidelines, Docket Number 13-CCEJA-1

Dear Commissioners:

Temecula Valley Unified School District (TVUSD) requests that the Commission re-evaluate the current interpretation of PRC 26233(b)(3) which states "for every LEA that receives over… $1,000,000 pursuant to this subdivision, not less than 50 percent of the funds shall be used for projects larger than two hundred fifty thousand dollars ($250,000) that achieve substantial energy efficiency, clean energy, and jobs benefits."

As explained during the webinar regarding the regulations, as interpreted currently, the entire $250,000 must be spent at one school site. Since TVUSD will be receiving approximately $1.6 million, at least half of the money will need to be spent on a maximum of three of our thirty-three school sites. We believe that the Code could also be interpreted that like projects across multiple sites with a minimum value of $250,000 could also be used to meet that requirement.

In evaluating potential energy projects, the District believes that greater energy savings can be achieved by spending smaller amounts of money at multiple school sites. In the case of our district, we are looking at installing energy management systems (EMS), which are listed amongst the highest return projects available. The EMS installations can still be grouped to create a large project over the $250,000 threshold. The installations will just benefit more than one site.

Managing a project in this manner will allow the district to achieve greater economies of scale than doing multiple projects at one school site to achieve the $250,000 minimum "site" value while also achieving greater energy savings. Districts will also have a better chance of being able to leverage funds from Proposition 39 with other funding available from Investor Owned Utilities and other resources if they are not constrained by having to spend a minimum dollar amount per site.

Thank you for your consideration. We appreciate the benefits that the funding from Proposition 39 has to offer, and want to spend the funds in a way that provides the greatest energy saving benefit to our District.

Sincerely,

Janet Dixon
Director of Facilities Development
Temecula Valley Unified School District

Cc: Lori Ordway-Peck, Assistant Superintendent of Business Support Services

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