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October 25, 2013

California Energy Commission
DOCKETED
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OCT. 25 2013

California Energy Commission
1516 Ninth Street, MS-29
Sacramento, CA 95814-5512

Re: Proposition 39: California Clean Energy Jobs Act -2013
Revisions Dated October 2013
Turlock Irrigation Districts Comments/Questions

Gentlemen:

The following is a list of questions and concerns Turlock Irrigation District has on behalf of the proposed Proposition 39.

1. Per Step 8: Project Tracking and Reporting, Energy Savings Requirements (pg. 25) – ***Each LEA are required to report the actual energy savings after the completion of the energy projects***. Will the Utilities (Turlock Irrigation District) be able to claim the Energy Savings that each school is claiming?

2. Per Step 8: Project Tracking and Reporting, Energy Savings Requirements (pg. 25) – ***The actual energy savings is based on the difference between annual energy use before the projects installed and the annual energy use after.*** This methodology is different from how the Utilities are claiming actual savings. If the Utilities are able to claim these savings, what methodology should we be using? It would not be recommended to use this methodology for claiming actual savings.

3. Per Step 8: Project Tracking and Reporting, Energy Savings Requirements (pg. 25) – ***Project – level energy savings shall be reported by choosing any one of the four methods:***
A. Utility Incentive Completion Report. For energy efficiency projects that receive utility incentive, the M&V requirements of the utilities can be used to determine the actual energy savings. If the Utilities are providing incentives, than they should be claiming the savings. However, will this equate to reporting energy savings twice? Also, the Utilities pay for an EM&V each year, how does that affect the timing for the LEA's, since they have to report when the project is completed? The Utilities and the LEA's don't want to both have to pay for and EM&V.

4. Per Step 8: Project Tracking and Reporting, Energy Savings Requirements (pg. 25) – ***Project – level energy savings shall be reported by choosing any one of the four methods:***
   D. Third-party M&V report. In some cases, an LEA may choose to hire an independent M&V consultant to conduct the detailed M&V for each energy efficiency project or for continuous monitoring. A third-party prepared M&V or commissioning report can also be used for this purpose. Again, would the Utility have to do a third-party EM&V if the LEA is already doing so? Assuming, the Utilities are able to claim the savings.

If you should have any further questions or would like some more information, please feel free to contact myself at 209-883-8342.

Sincerely,

Turlock Irrigation District

Monique Hampton

Monique Hampton
Utility Analyst