



Membership Meeting
October 28, 2014
1:00 p.m. to 2:00 p.m.
Newport Marriot – Costa Mesa

Agenda

Welcome

- *Anna Ferrera, Executive Director*

SEC Fall Forums Summary

- *Anna Ferrera, Executive Director*

Prop 39 Proposed Energy Commission Language and SEC Recommendations

- *Anna Ferrera, Executive Director*

Water Issues, Workshops and the DROPS Program

- *Anna Ferrera, Executive Director*

Legislative Wrap Up and Potential 2015 Legislation

- *Anna Ferrera, Executive Director*

Upcoming Events

- SEC Spring Forums
 - March 23, 2015 in Costa Mesa
 - March, 2015 in Sacramento

Membership and Other Items for Discussion



Membership Meeting
Newport Beach
October 28, 2014

SCHOOL ENERGY COALITION

Who We Are

- The School Energy Coalition (SEC) is made up of school districts, county offices of education, community colleges and private sector associates who have made or are planning to make investments in school energy projects.
- Relevant State agencies also actively participate in SEC forums to discuss the impacts of energy efficiency, conservation, and renewable measures on K-14 schools.



Membership

- Membership in the School Energy Coalition gives you access to essential and timely updates on Proposition 39, Rates, Water, Public Utilities Commission, California Department of Education, California Energy Commission, Legislation, Legislative Analyst's Office, State Budget and more.
- Participate in hearings and proceedings at these agencies in a timely way that will impact and affect statewide projects.
- Discounts on SEC workshops and webinars.



Proposition 39 Update: Original State and District Goals

- Success for the State through *energy* savings
- Success for districts through *cost* savings
- Jobs
- Savings for the lifetime of the project especially in light of anticipated electricity rate increases
- Investing a portion of the savings back into facilities and maintenance
- Changing the way we look at our school facilities going forward - Adding Water to SEC Agenda



Prop 39 Second Year Update: Where are We Now?

- Preparing Energy Expenditure Plans (EEP)
- Waiting for multi-agency approvals (CEC, CDE, DSA, and CCC) and *funding*
- Ensuring accountability and transparency in awarding funds (Non-Sole Source Process)
- Leveraging and job creation
- Fiscal planning for reinvestment of savings in efficiency and green buildings
- Reviewing Proposed Substantive Changes to CEC Guidelines and participating in stakeholder process - for December 10 Approval



Proposition 39: Eligibility

- Eligible Projects: Energy efficiency measures and/or clean energy installations
- Eligible Applicants: LEAs: County Offices of Education, School Districts, Charter Schools, State Special Schools and Community Colleges
- All Facilities Within the LEA: School site facilities include: classrooms, office facilities, auditoriums, multi-purpose rooms, gymnasiums, cafeterias, kitchens, pools, and special purposes areas



Prop 39 Award Allocations

| Tier Levels | Average Daily Attendance Prior Year | Minimum Funding Awards |
|-------------|-------------------------------------|---|
| Tier 1 | 100 or fewer | \$15,000 plus FRPM |
| Tier 2 | 101-1,000 | Based on prior year ADA or \$50,000 (whichever amount is larger) plus FRPM |
| Tier 3 | 1,001 to 1,999 | Based on prior year ADA or \$100,000 (whichever amount is larger) plus FRPM |
| Tier 4 | 2,000 or more | Based on prior year ADA plus FRPM |



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Energy Planning Funding

Portion of 2013-14 yr funding only – Now Closed

Allowed Energy Planning Activities:

- Energy audits and energy surveys/assessments
- Proposition 39 program assistance
- Hiring or retaining energy manager – For years 2-5 - LEAs may request up to 10 % of their annual award for this. May pool funding & share manager
- Energy-related training for classified employees – years 2-5 - may use up to 2% of annual award.
- Clarifying language that planning funds may be used in LEA first year of eligibility - in proposed Guidelines.



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Tier 4 Awards: Large Eligible Energy Project Award Requirements

- For LEAs that receive an award of more than \$1 million in any one fiscal year, not less than 50 percent of this funding must be used on large energy projects
 - A *large eligible energy project* is defined as a group of energy efficiency measures combined for a project cost totaling more than \$250,000
- *The intent of the law: LEAs to implement deep retrofits at large individual school sites



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CEC's Funding Approval Process

All LEA's have the same two options for EEPs:

- Annual Award
- Multiple-year (bundled) EEP which can include a full five-year program award plan. CEC will review on an annual basis – Clarifying language regarding funding for multi-year plans in proposed language

EEP Plan Review and Approval Process at CEC

- CEC will notify CDE and LEAs of approved EEPs on an ongoing basis until and unless workload dictates otherwise



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CEC's Funding Approval Process

Project Sequencing: LEAs Should Consider:

- First, maximize energy efficiency
- Next, clean energy generation (e.g. solar PV panels, water heating systems, wind, biogas, combined heat & power, etc.)
- Finally, non-renewable energy generation measures (e.g. combined heat and power project systems)

Self Certification:

Eleven factors from the statute LEAs are required to consider (age, Title 1, recent mod, year-round operations, potential for energy demand reduction, number of jobs, etc.)



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CEC's Funding Approval Process: EEP

12 month Electric and Gas Usage/Billing Data

- Identify all electric, natural gas, propane, or fuel oil accounts for all its schools and facilities
- Provide a signed utility data release form allowing CEC to access past 12 month and future utility billing data through 2023

Benchmarking

- Building simulators, ASHRAE, or utility options are available and may be used
- Free tools like ENERGY STAR Portfolio Mgr or LBNL's Energy IQ are good options



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CEC's Funding Approval Process: Cost-Effectiveness Determination

Savings to Investment Ratio (SIR)

- SIR Formula based on present value of savings divided by project installation cost, subtracting rebates and other grant fund sources. Formula and calculator in Handbook.
- Inputs such as energy and maintenance savings over installation costs – minus “non-repayable funding sources” and other rebates. (New Appendix D)
- Energy Commission online calculator in Forms A and B must be used
- An eligible energy project must achieve a minimum **SIR of 1.05** to be approved for Prop 39 award and new language says the projects may be bundled “within an LEA”



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CEC Funding Approval Process: EEP

Energy Expenditure Plan: Essential Items

– EEP Must be Complete to Submit to CEC:

- Expenditure Plan General Form A
- Expenditure Plan Project Summary Form B – One for each site (Audit and Benchmarking info to be used in Form A – should do this form first)
- Consent for utility provider to release usage data
- Energy Calculators (if applicable)
- Description of energy planning funds expended from 2013-14 year funding only



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CEC's Funding Approval Process: EEP

Energy Expenditure Plan: Essential Items (Cont.)

- Energy training request (optional)
- Energy manager request (optional)
- Non-energy benefits project (adder/optional)
- Job creation benefits estimation
- Self-Certifications of compliance with various requirements
- Leased facility certification (if applicable)



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CEC Tracking and District Reporting

After EEP is Approved

- LEA Submits Annual Status Reports – required until an approved EEP is completed
- Final Reports – After Project is Completed

To include seven elements required by statute

(Final gross product cost, estimated amount of energy consumed and saved, number of FTEs or trainees created, time elapsed between award and project completion, energy intensity before and after project, etc.)



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Audit Guide Language:

For Audit Guide 2013-14 (EAAP Approved on 2/10/14)

- Representative sample of CA Clean Energy Jobs Act expenditures and verify they were consistent with the approved plan and the Prop 39 Program Guidelines
- Determine that the total expenditure for planning funds did not exceed the planning fund award amount
- Determine if the LEA was in compliance with *Public Resources Code* Section 26235(c) by verifying that a sole source process was not used to award funds. An LEA may use the Best Value criteria
- If any expenditures are found to have been made for non-qualifying purposes or not in accordance with law, include a finding in the Findings and Recommendations section of the audit report stating the amount inappropriately expended



Additional Proposition 39 State Resources

CEC's Energy Conservation Assistance Act – (ECAA-Ed) Program

- 0% interest rate loans for energy efficiency projects
- Technical assistance for planning, energy audits and project recommendations
- 2014-15 Budget Funding TBD: Not in Governor's Proposal or Assembly but State Senate Sub has included \$28 million

California Workforce Investment Board (WIB) Grant Program

- Earn and learn job training and placement programs
- Targeting disadvantaged job seekers

California Conservation Corps' (CCC)

- Conduct Energy Surveys
- Implement basic energy efficiency measures



Other Related School Energy Items

- Title 24 Changes to Code – Took Effect July 1, 2014 – State seeking "maximum energy savings" in existing buildings & new construction. Areas of change include building envelope and mechanical requirements, indoor and outdoor lighting and overall scope changes.
- Rates and CPUC Proceedings – Ongoing
- Water conservation issues as State seeks to address drought impacts – SEC/C.A.S.H. Workshop in Nov 2014



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New Changes to Proposition 39 Guidelines Issued September 26, 2014

- In mid-September SEC wrote a letter to CEC in anticipation of revisions to the Prop 39 Guidelines – In your packet – feel free to use the SEC letter as a template
- The Energy Commission begins comprehensive substantive changes cycle for the Proposition 39: California Clean Energy Jobs Act -2015 Program Implementation Guidelines. Proposed draft revisions are now available online at: <http://www.energy.ca.gov/efficiency/proposition39/index.html>
- The CEC has invited the public to provide comments through October 27, 2014, by emailing docket@energy.ca.gov.
- In the email subject line, please indicate Prop 39 13-CCEJA-01.



New Definition of Eligible Energy Projects

- CEC accepted SEC's recommendation to expand the definition of an eligible energy project. If approved, would allow LEAs to bundle projects together from more than one school site LEA-wide to be considered in the Savings-to-Investment Ratio (SIR) formula
- Will give schools a broader reach in layering projects to meet that required 1.05 minimum for the SIR
- Should also be very helpful in meeting that requirement and also in accounting for projects that may be installed LEA-wide such as lighting



SIR Clarifies Non-Repayable=Bond Funds: New Appendix D

- **CURRENT LANGUAGE:** The SIR is calculated based on present value of savings divided by project installation cost subtracting project rebates and other grant fund sources
- **REMOVED:** (If total project installation cost are greater than the Prop 39 program award and additional financing is required, such as bond funds or private capital funds, this financing is to be considered part of the total project installation cost and is not deducted from the total project installation cost like a project rebate or other grant funding source.)
- **NEW LANGUAGE:** The total Prop 39 award amount is the Project Installation Cost minus rebates and other non-repayable funds

CEC has made clear: "non-repayable funds" includes bond funds



“Contracts” Section Combines Codes – Impact to Non-Sole Source?

- Language states that: As stated above in PRC 26235(c), "A community college district or LEAs shall not use a sole source process to award funds pursuant to this chapter." This applies to all Proposition 39 program award funding, including award funding for energy planning activities. *However, pursuant to Public Contract Code (PCC) Section 20111, any public projects involving an expenditure under \$15,000 do not need to be competitively bid. (emphasis added)*
- SEC is asking for the removal of the PCC language. At least need clarification on what this might mean for contracts above \$15,000 and pursuant to the "non-sole source process" required for awarding Prop 39 funds.



Clarifies Rules About Multi-Year (Bundled) Award EEPs

CURRENT LANGUAGE: An LEA may submit an Energy Expenditure Plan (EEP) that includes a bundled multi-year award up to the full five-year estimated amount

- Clarifies that because Fund revenue is appropriated annually by the Legislature, LEAs are NOT guaranteed to receive the total *estimated* amount calculated in its multiple-year award *approximation*. Will receive the Prop 39 program award funding annually and not one multi-year lump sum
- The LEA's annual Prop 39 award allocation for multi-year plans will be distributed from the SPI every January, after award calculations are announced in November of the preceding year
- The LEA and CEC will review the multi-year plans annually to ensure projects are on track and will adjust the plan, if necessary



Online EEP Reporting

- Annual Reports: LEAs must use online annual progress status reporting - portal now available on the CEC Prop 39 webpage
- Completed Project Reports: CEC will be adding an online tracking system in partnership with the California Workforce Development Agency for reporting on all completed projects within 12-15 months of completion
- Final Reports: CEC will be adding an online system that will require information such as final gross project cost, energy savings and intensity, jobs created, amount of time the project took to complete



Funding Audits

- CURRENT STATUTE LANGUAGE
 - Public Resources Code Section 26206(e) states, "All projects shall be subject to audit."
 - Public Resources Code, Section 26240(h)(1) states that the SPI shall require LEAs to pay back funds if they are not used in accordance with statute or regulations, if a project is torn down or remodeled, or if the property is deemed to be surplus and sold prior to the payback of the project.



Funding Audits (Cont.)

Proposed Prop 39 Audit Clarifying Language:

- LEAs can only use Prop 39 funding for the eligible energy projects approved in its EEP.
- LEAs must not sell or demolish the approved energy measure installed with Prop 39 funding prior to payback. The payback is calculated by dividing the total energy measure cost by the total annual energy savings:

$$\text{Payback} = \text{Total Energy Measure Cost (\$)} / \text{Annual Energy Savings (\$/yr)}$$

- The property is considered the facility or building where the energy measure is installed.
- A copy of the audit guide can be found at:

<http://eaap.ca.gov/audit-guide/current-audit-guide-booklet/>



Other Revisions to CEC Guidelines Schools Should Be Aware of – To Be Approved

- Interest Earned on Prop 39 Funds: Only expended on Prop 39 projects. If not expended, shall be returned to General Fund
- Removal of Appendix B on Energy Efficiency Measures & Calculators and Appendix F from Guidelines: They will be located in Prop 39 Handbook
- Format for ASHRAE Level 2 audits – Documentation required and recommended format in Handbook
- Utility Data Release Authorization Form: Must Use CEC Utility Data Release Authorization Form and not a utility form
- Reporting Job Creation Benefits: Data to be obtained by Department of Industrial Relations (DIR) and with Guidance from CA Workforce Investment Board and Labor and Workforce development Agency
- Public Works Project Notification Changed to reflect the new DIR rules and should be reported online using the PWC-100 form



CEC Process for Comment and Approval

- The public is invited to provide comments through October 27, 2014, by emailing docket@energy.ca.gov.
- In the email subject line, please indicate **Prop 39 13-CCEJA-01**
- In November, a 15-day public notice of the proposed substantive changes will be posted.
- These substantive changes will be considered at the Energy Commission's December 10, 2014, Business Meeting.



Sole Source Language in SB 73

- (c) A community college district or LEA shall not use a sole source process to award funds pursuant to this chapter. A community college district or LEA may use the best value criteria as defined in paragraph (1) of subdivision (c) of Section 20133 of the Public Contract Code to award funds pursuant to this chapter.



Education Audit Appeal Panel Language

- (c) Verify that the LEA was in compliance with Section 26235(c) of the Public Resources Code which states that an LEA may not use a sole source process to award funds, and that an LEA may use the best value criteria as defined in paragraph (1) of subdivision (c) of Section 20133 of the Public Contract Code.



One Federal Definition of Sole Source

- **“Sole source acquisition”** means a contract for the purchase of supplies or services that is entered into or proposed to be entered into by an agency after soliciting and negotiating with only one source.

Source: Federal Acquisition Regulation
<http://www.acquisition.gov/far/current/html/Subpart%202.1.html>



Overarching Things to Remember About Sole Source:

- Start and end with non-Sole Source in mind
- Recent amendments to CEC Guidelines (to be approved on December 10) clarify that the “non-sole source” process also applies to planning funds.
- Keep clear documents memorializing your process
- Consider checking with your auditor if you believe your district's selection process could be sole source



Proposition 39 Overview



Contact Information

Anna Ferrera

*Executive Director of the
School Energy Coalition.*



SCHOOL ENERGY COALITION

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*A former appointee and Senior
Advisor at the U.S.*

*Department of Energy and
former staff to the California
State Senate on energy issues.*



Proposition 39 Guideline: Substantive Changes

Summary of Proposed Changes

| Topic | Guideline Revision | Issue | Page # |
|--|---|--|--------------------------|
| Minor word changes/edits | Revised minor wording for clarity | Provides clearer understanding. | Various |
| Updated Guidelines to reflect their adoption in December 19, 2013. | Changed verbs from future tense to past tense. | The Guidelines were originally written in anticipation of their adoption at the December 19, 2013 Energy Commission Business Meeting. | Various |
| Fiscal year 2013/14 appropriations moved. Fiscal year 2014/15 appropriations added. | Relocated the historical 2013/14 fiscal year appropriations from page 1 to Appendix A. | The new fiscal year 2014/15 will now be on page 1, but the historical appropriations information will remain in the document, under Appendix A | 1 and Appendix A |
| California Community College Chancellor's Office | CCCCO is exempt from the requirements of the Proposition 39 Guidelines for the five year program. | The CCCCCO program will continue as a separate program. | 3 |
| Definition of Eligible Energy Project | Revised the definition of an eligible energy project. Changed from a bundled group of energy efficiency measures and/or clean energy installations in or at a school site to efficiency measures and/or clean energy installations within an LEA. | An eligible energy project must achieve a minimum savings-to-investment ratio (SIR) of 1.05. LEAs now can bundle energy efficiency measures and/or clean energy installations (in or at one or <u>more school sites</u>) within an LEA. | 6, 23, 24 and Appendix G |
| Schedule | Added date for SSPI to begin allocationing awards for approved multiple-year energy expenditure plans. | In the second year of the Proposition 39 program and moving forward, many LEAs will be receiving their annual allocations based on a multiple year energy expenditure plan approved in a prior fiscal year. SSPI will allocate these awards starting in January 2015 (annually). | 9 |

Proposition 39 Guideline: Substantive Changes

| Topic | Guideline Revision | Issue | Page # |
|---|---|--|-----------|
| Interest Earned on Proposition 39 Funds | Added a new subcategory within the Award Allocation section regarding interest earned. | Provides new guidelines to LEAs on how the interest earned on Proposition 39 funds can be expended. | 11 |
| Two-year Combined Award Option | Added clarification language. | LEAs in Tier 1 and Tier 2 can select this option twice during the five year Proposition 39 program. | 11 |
| Energy Planning Funds Reservation Option | Added clarification language. | Provides clarification on energy planning fund eligibility for LEAs whose first year of program eligibility occurs after fiscal year 2013-14. | 11 and 12 |
| Energy Survey and ASHRAE Level 2 Energy Audit Requirements | Added the sentence: <i>“Additional information on energy project supporting documentation is included in the <u>Energy Expenditure Plan Handbook</u>.”</i> | In an effort to expedite the review and approval of energy expenditure plans, the <u>Energy Expenditure Plan Handbook</u> provides a recommended format to use when submitting energy audits as back up documentation. | 22 |
| Multiple-year (Bundled) award energy expenditure plan | Added clarification paragraph. | Provides clarification on when LEAs will receive yearly allocations approved in a multiple-year energy expenditure plan. | 25 |
| Energy Expenditure Plan Content - Utility Data Release Authorization Form | Removed option for LEA to use a utility authorization form. | LEAs must use the Energy Commission’s Utility Data Release Authorization form when consenting the LEA’s utility provider(s) to release historic and ongoing billing data to the Energy Commission. | 26 |
| Energy Project Tracking and Reporting | Added various edits and clarification language. | Provides clarification that the Energy Commission will add an online program reporting system to the Proposition 39 Web page. | 30 - 32 |
| Job Creation Benefits | Added various edits and clarification language. | Provides clarification on certified payroll and LEA self-reported employee wage records needed for reporting job creation benefits of funded projects. | 33 |
| Audit | Added clarification paragraphs. | Provides clarification on payback, project and property related to PRC 26240(h)(1). Also provides web link to CDE’s current audit guide booklet. | 34 |

Proposition 39 Guideline: Substantive Changes

| Topic | Guideline Revision | Issue | Page # |
|---|---|---|--------|
| Energy Expenditure Plan Implementation Changes | Deleted <i>“Relocating an energy measure to a different school site. For example, retrofitting HVAC units at School A, when the energy expenditure plan indicated the HVAC units for School B.”</i> | This will not be allowed for amendments. A new energy expenditure plan will need to be submitted to the Energy Commission if an energy measure is relocated to a different school site. | 35 |
| Contracts | Added clarification language. | Added clarification that the no sole source applies to all Proposition 39 program award funding, including energy planning funds. Added Reference to PCC Section 20111. | 36 |
| Public Works Project Award Notification and Payroll Reporting | Removed original section and replaced with updated section. | Provides updated information and clarification on current Department of Industrial Relations requirements. | 36-37 |
| Appendix B: Energy Savings Calculators | Removed original Appendix B: Energy Savings Calculators from the Guidelines. | This information is also in the Energy Expenditure Plan Handbook. | B-1 |
| Appendix D: Savings-to-investment Ratio (SIR) Calculation | Revised leveraged funding that can be subtracted from the project installation cost in the SIR calculation. | Removed “grants” and added non-repayable funds such as bond funding, deferred maintenance, general operation budgets and other funds used to finance the project. | D-1 |
| Appendix F: Effective Useful Life of Energy Measures in Years | Removed from Guidelines. | This information is better placed in the Energy Expenditure Plan Handbook. | F-1 |



September 19, 2014

The Honorable Andrew McAllister
Commissioner
California Energy Commission
1516 Ninth Street, MS-29
Sacramento, CA 95814

Dear Commissioner McAllister:

On behalf of the School Energy Coalition (SEC), an organization made up of K-12 schools, community colleges, school construction and energy consultants focused on energy efficiency and renewable generation projects for California's students, I am writing to share our support for the Proposition 39 Program and some suggestions as you begin the process of revising the program's Guidelines over the next few weeks.

Since the California Energy Commission's (CEC) Proposition 39 Guidelines were approved in December 2013, SEC has worked to assist school districts, county offices of education and charter schools to stay up-to-date on the information changes and meeting the requirements for Energy Expenditure Plan (EEP) approval.

SEC has held over nine workshops and two webinars addressing energy issues of importance to schools, most with a Proposition 39 focus. We have also surveyed our schools specifically regarding the Proposition 39 program and the challenges schools are facing in meeting the requirements for approval.

Overall, schools appreciate the flexibility in the energy project funding program and appreciate that the Commission has listened to Local Education Agencies (LEA) concerns, making adjustments where needed and warranted over the past year as individual schools have moved through the approval process.

As the Commission is contemplating a more whole scale review of the guidelines, we would like to offer the following input and comments to identify areas that remain of concern for your further consideration:

Definition of Cost Effectiveness

After gathering data and benchmarking their sites, the required Savings-to-Investment-Ratio (SIR) of 1.05 is the most challenging part of the approval process for schools. We would suggest the following:

- In order to allow for the most flexibility in reaching this number, we suggest that each *individual school site*, be changed to LEA.
- That schools may apply the SIR over multiple years if they have a multi-year plan.
- Please clarify how planning funds that rollover to the actual project are accounted for in the SIR.



Credit for Recent Efficiency Installations

- Many schools have already been proactive on energy efficiency and have installed new lighting and sensors over the past few years. We would suggest some consideration for energy installations and savings that have occurred within the past three years prior to Guideline Approval.
- In some cases LEA's have completed extensive energy efficiency and renewable energy projects to the degree that they do not have any upgrades left to complete that would meet the SIR requirements. We suggest that there be a process identified for allowing LEA's in this situation to fund projects of a lesser SIR than 1.05.

Solar

- Schools would support more options to do solar projects with Proposition 39 funding should they choose to do this, especially when efficiency measures have been already installed.
- SEC supports the solar industries' suggestions to change the way the SIR is calculated for Power Purchase Agreements (PPAs) to allow these projects to better go forward under the Proposition 39 Program.
- SEC supports revisions to the solar calculator that better match industry standards for such variables as solar panel life span, inverter life span and solar panel degradation.
- SEC would like the CEC to make the details of their solar SIR calculation available to LEA's so that it can be compared to calculations completed by solar companies and consultants.

Proposition Funding Relationships between LEAs

- Clarify how LEAs may show that funding has been pooled for the purposes of the Program, for example an energy manager or other planning fund uses. Is a Memorandum of Understanding (MOU) or other type of documentation required?
- Existing relationships between LEAs. How might Charter Schools document compensation to school districts, or vice versa, with Prop 39 funding for energy assistance to meet program requirements?
- Please clarify whether sole source language applies to work provided between COEs or Districts and charters.
- There are some charter schools which do not have school facilities, but operate on-line. How are these funds to be allocated? May they be accessed by the chartering LEA?

Correlating with Other Energy Programs

- Schools have other state energy programs and regulations they must comply with. It would be useful to have guidance on how schools may integrate the changes to the state's Green Codes and Title 24 requirements for schools with Proposition 39 projects.
- Due to the recent 2013 CA Energy Code incentive programs across the state are in the process of being re-calculated to align with the new code requirements. In some cases these changes in incentive calculations may have a significant impact on SIR calculations. However, the updated incentive calculations are not expected to be available until early in 2015. What will be the requirements for LEA's to update incentive calculations in their SIR once the programs are updated?



Disapproval Process

- SEC appreciates that CEC staff has stated in outreach meetings that the goal is not to disapprove proposals, but to work with LEAs to move toward approval. However, the specificity of the “Disapproval Process” has raised some concerns with our members. It appears that once you move to this correction and resubmission docket it is a very formal and bureaucratic process. Given that a plan can be returned and for resubmission, is a disapproval process even necessary?

We appreciate the ability to share our concerns with you. Please do not hesitate to contact me (916.441.3300 or aferrera@m-w-h.com) with any questions regarding the information contained in this letter.

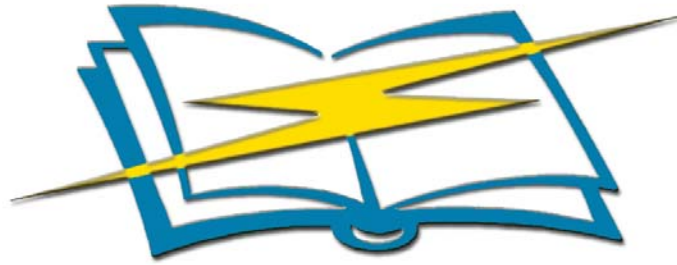
Sincerely,

A handwritten signature in black ink, appearing to read "Anna Ferrera", with a long horizontal flourish extending to the right.

Anna Ferrera
Executive Director

AF:ad

c: Robert B. Weisenmiller, Ph.D., Commissioner
Karen Douglas, J.D., Commissioner
David Hochschild, Commissioner
Janea A. Scott, Commissioner
Hazel Miranda
Elizabeth Shirakh
Marcia Smith
Rob Oglesby
Grant Mack



SCHOOL ENERGY COALITION

Useful Links

- ✓ **California Energy Commission**
View the latest version of the Guidelines, and updates from CEC on Proposition 39
<http://energy.ca.gov/efficiency/proposition39/index.html>
- ✓ **California Department of Education**
Information on awards and planning funds
<http://www.cde.ca.gov/fg/aa/ca/prop39cceja.asp>

Upcoming Events

- ✓ **Water Management and Conservation Planning for Schools: Funding, Savings, Drought Conditions, Make the Timing Right**

ONTARIO
Friday, November 7, 2014
8:30 a.m. to 3:00 p.m.
Ontario Airport Radisson, Ontario, CA

SACRAMENTO
Tuesday, November 18, 2014
8:30 a.m. to 3:00 p.m.
DoubleTree Hotel, Sacramento CA

BAKERSFIELD -
Friday, November 21, 2014
8:30 a.m. to 3:00 p.m.
Kern County Office of Education
- ✓ **School Energy Coalition Membership Meeting**
February, 2015
Sacramento, California
- ✓ **School Energy Coalition Spring Forums**
Ayres Hotel & Suites
Costa Mesa, California
March 23, 2015
9:00 a.m. to 3:00 p.m.

Sacramento, California
March, 2015
9:00 a.m. to 3:00 p.m.

School Energy Coalition

1130 K Street, Suite 210 - Sacramento, CA 95814