



March 15, 2018

The Honorable Chris Holden
Chair, Assembly Utilities and Energy Committee
State Capitol, Room 5132
Sacramento, CA 95814

Assembly Bill 2431 (Weber)
Position: SUPPORT

Dear Assembly Member Holden:

The School Energy Coalition (SEC), a statewide organization made up of K-12 schools, community colleges, school construction and energy consultants focused on energy and water efficiency and renewable generation projects for California's students, requests your support for Assembly Bill 2431 (Weber) when the bill is heard in the Assembly Utilities and Energy Committee on April 4, 2018.

AB 2431 would allow K-12 school districts and community colleges - also known as local education agencies (LEA) - to be eligible to participate in the California Public Utilities Commission's (CPUC) Intervenor Compensation (IComp) Program. The IComp program may reimburse eligible applicants for expenditures incurred when formally participating in a CPUC proceeding only if they qualify under the specific parameters of the program. This bill would ensure that financial status does not bar school district customers with critical information from informing the decision-making process.

Formal participation in CPUC proceedings can be costly and time-consuming and schools have no way to raise funds for this important purpose through taxes or fees. Currently, most LEAs are unable to participate formally due to the financial burden and, thus, Commissioners may not be fully informed of fiscal, safety, and other impacts to school districts, students and communities across the state when deliberating on such proceedings.

LEAs have unique consumer and stakeholder utility concerns as they seek to educate California's K-14 students in classrooms, labs, libraries and other facilities. Schools are currently making greater investments in energy efficiency and renewable projects with taxpayer funding directed for that purpose through the Proposition 39 program. The savings generated from these investments on school sites are impacted by changes in electricity rates that can alter promised payback periods and return on investment that is required for approval under the Proposition 39 program.



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Being eligible for this reimbursement would better allow LEAs to formally participate in these proceedings and provide vital information to Commissioners about how schools in a particular Investor-Owned Utility (IOU) territory would be impacted by their proposed decisions.

Requirements for reimbursement under the IComp program address concerns that have been expressed about LEAs over-taxing the program fund. IComp Program requirements state that there should be no “duplication of effort.” Thus, similar parties may not repeat the same concerns or they risk being ineligible for reimbursement. The requirement to avoid duplication of work performed by other parties is found in Public Utilities Code § 1801.3(f) and 1802.5.

We appreciate your consideration of this legislation that will allow for more public input on energy decisions that could affect California’s students and the investments schools have made given their unique and fixed energy usage profile.

Please contact me with questions or concerns regarding this letter.

Sincerely,

Anna Ferrera
Anna Ferrera
School Energy Coalition

cc: Members, Assembly Utilities and Energy Committee