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## Comments to 9.17.2013 Agenda No. 11-CF 11-1394-Green Retrofit Program Fund

1 message

Joyce Dillard <dillardjoyce@yahoo.com>

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We disagree with this ordinance in its intention to change Energy Conservation into Green Retrofit.

They are not the same as Green Retrofit has no guidance or aspects of energy reduction or efficiency usage through energy audits. This is an aspect of CONSERVATION in the LADWP's Integrated Resource Plans including LOAD FACTOR CONTROLS.

The purpose of the fund, per LAAC 5.532 states:

The purpose of the Fund shall be for the receipt, retention and disbursement of monies borrowed or otherwise received by the City from the Los Angeles Department of Water and Power for the purchase and installation of energy efficiency measures in City buildings and facilities.

Environmental sustainability is not a task of LADWP in the service of utility delivery.

You now state in the PROPOSED ORDINANCE:

(b) The purpose of the Fund shall be for the receipt, retention and disbursement of grant and other monies and property accepted from persons or entities or otherwise received by the City for the purchase, installation and monitoring of energy and water efficiency and environmentally sustainable measures in City buildings and facilities.

And

(e) All revenues and expenditures of the Green Retrofit Program shall be accounted for in the Fund, including all loans from the Department of Water and Power pursuant to Los Angeles Administrative Code Section 23 141 (e) The General Manager shall report to the City Council regarding and identifying all revenues and expenditures of the Fund, as well as the purposes for which the expenditures were made. Each report shall cover a fiscal year and shall be submitted within 60 days after the close of said fiscal year.

This is an allowance of monies outside of LADWP to be co-mingled with other collections. This is an auditing nightmare.

Then you state in the PROPOSED ORDINANCE:

 (i) At the close of any fiscal year, surplus money remaining in the fund shall remain in the Fund and shall not revert to the Reserve Fund to ensure the future sustainability of energy efficiency, water conservation, and environmentally sustainable projects.
Now any LADWP surplus money would be transferred to the Reserve Fund. On a loan? That does not make sense for accountability of utility costs.

Any GREEN RETROFIT PROGRAM FUND should be separate from the ENERGY CONSERVATION LOAN PRORAM FUND.

Jurisdictional issues of utility enforcement should also be a consideration.

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