

**DOCKETED**

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<b>Project Title:</b>	School Energy Efficiency Stimulus Program
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February 3, 2021

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Project Title: School Energy Efficiency Stimulus Program

Dear Energy Commission Staff, & Commissioners,

Thank you for the opportunity to provide comments regarding the upcoming School Reopening Ventilation and Energy Efficiency Verification and Repair (SRVEVER) program. By way of background, I was the Proposition 39 (Clean Energy) Energy Manager on behalf of 140 LEAs throughout the state, for whom I developed and managed the implementation of ~\$37M in Prop 39-funded projects. Many of the school clients I worked with fall into one or more of the categories for underserved communities as outlined in the AB841 legislation. My on the ground experience with the LEAs and their projects therefore inform my comments today.

While the aim of targeting underserved communities is a worthwhile goal, the program requirements are quite technical and most LEAs – and certainly those in underserved communities - lack the internal resources to properly address. The application process itself – in advance of any award or funding – as well as the post-project verification report, for example, require expertise that most LEAs do not have in-house and lack budget funds to allocate towards. Yet the guidelines preclude program funding being used for third-party assistance. Without outside expertise or consultation many, if not most, LEAs in underserved communities will not be able to participate. In order to ensure robust participation, I would therefore request the CEC consider allowing a portion of the AB 841 funding to be allocated to program administration/management as was the case with Prop 39 Planning Funds.

Secondly, the program guidelines stipulate that up to 50% of an LEA's awarded funding may be provided in advance of the project start, with the remaining 50% available upon completion. This puts a financial burden on the LEA that must carry the remaining cost of the projects through to completion. While this requirement is likely onerous for all but the largest District LEAs, it will certainly preclude participation by LEA's in underserved communities, most of whom do not have the financial capacity to carry a project through to

completion. I would respectfully request the CEC consider a net 30-day reimbursable structure whereby LEA's are reimbursed at progressive project milestones (defined in the application) as the project proceeds. There is precedent for such a structure in the ECAA loan program.

Thank you for the opportunity to provide input and for your consideration of these comments.

Sincerely yours,

A handwritten signature in blue ink, appearing to read "Chris Ing". The signature is stylized with a large loop and a horizontal stroke extending to the right.

Chris Ing, M.A., C.E.M.