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Document Title:	Question and Answer Response Summary for SNPFA Program Workshop
Description:	This Question and Answer Response Summary was developed to provide answers to questions received during the January 22, 2021, Session 2 - School Noncompliant Plumbing Fixture and Appliance (SNPFA) Program Workshop
Filer:	Theresa Daniels
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Memorandum

To: Docket 20-RENEW-01
School Energy Efficiency Stimulus List Serve

Date: February 4, 2021

Telephone: (916) 639-0572

From: **Jonathan Fong, Office Manager**
Renewable Energy Division
California Energy Commission
1516 Ninth Street
Sacramento CA 95814-5512

Subject: **Question & Answer Response Summary for Questions Received During the School Energy Efficiency Stimulus Workshop January 22, 2021, Session 2 – SNPFA Program**

The California Energy Commission (CEC) hosted a remote access workshop on January 22, 2021, to discuss implementation of the School Energy Efficiency Stimulus (SEES) Program and CEC staff's proposed implementing guidelines. The workshop was held in two sessions separately covering each of the SEES' grant programs, the School Reopening Ventilation and Energy Efficiency Verification and Repair (SRVEVR) Program and the School Noncompliant Plumbing Fixture and Appliance (SNPFA) Program.

This Question & Answer Response Summary was developed to provide answers to questions received during the Session 2 – SNPFA Program Workshop. Responses to questions received during the Session 1 – SRVEVR Program Workshop will be provided in a separate document.

Staff Draft Guidelines - for Discussion at January 22, 2021 Workshop School Noncompliance Plumbing Fixture and Appliance Program Guidelines ([Draft Program Guidelines](#)) were released prior to the workshop for review and comment.

During the Session 2 – SNPFA Program Workshop, CEC staff received many questions, including written questions through the remote meeting platform Zoom and this summary addresses many of the most frequently asked questions.

SNPFA Program Workshop Q&A - Topics and Responses

Eligibility

- Initial Program Scope

1. **What equipment is eligible for replacement?** Noncompliant plumbing fixtures and appliances eligible for replacement through the SNPFA program are only those specified in Public Utilities Code (PUC) Section 1630. See also Draft Program Guidelines Chapter 2 Section A. These fixtures are toilets, urinals, shower heads, and interior faucets. Eligible appliances are commercial dishwashers, automatic commercial ice makers, and commercial clothes washers. The legislation is prescriptive and does not allow for additional fixtures and appliances to be included.
2. **Are Administration Offices eligible to receive SNPFA funding?** CEC staff are recommending that initial program funding be reserved for schools located in underserved communities, but has not specified if administration offices **within** a school are eligible. An LEA does not have to be comprised of entirely underserved schools to be eligible for the initial funding. An LEA may apply for the schools meeting the underserved criteria and then apply again at a later date for the schools who are not underserved. CEC will continually evaluate available funding and the effectiveness of the program and revise the program guidelines if expansions of the eligibility, that could include off-site administrative offices, are appropriate.
3. **Is a school that meets the underserved requirements but shares a site with another school that does not meet underserved requirements eligible to apply for funding in the initial round?** SNPFA program staff are recommending that a site with multiple schools may still be eligible for program funding in the initial round even if only one of the schools meets the requirement of being located in an underserved community. The school meeting the underserved requirement will need to apply for program funding, however only the facilities utilized by the qualified school(s) will be eligible for fixture and appliance replacement.

- Costs

4. **Which costs are ineligible for funding?** SNPFA program staff have developed guidance and examples of ineligible costs in the Draft Program Guidelines under Chapter 3, Section G. CEC staff are currently reviewing comments on eligible costs and will make any updates as appropriate.

- Funding Tier

5. **How do enrollment numbers affect the grant awards?** CEC staff recommend using an approach developed for the CEC's Energy Conservation Assistance Act — Education Subaccount (ECAA-Ed) Competitive Loan Program so that program funds are available to a range of LEAs within each utility's service territory. This approach is

described in Chapter 1, Section D of the Draft Program Guidelines and categorizes LEAs into application tiers based on the LEA's student enrollment. The application tiers are defined in Table 1: LEA Tier by Enrollment Numbers in Chapter 1, Section D of the Draft Program Guidelines.

- Service territory

- 6. Are LEAs that receive electric service from a local publicly owned electric utility or community choice aggregator eligible for the program?** The Draft Program Guidelines cover eligible applicants in Chapter 1, Section D. LEAs may apply for funding for schools that are located in the service territory of California's large electric or gas investor-owned utilities, which are described in Chapter 1, Section C of the Draft Program Guidelines as PG&E, SCE, SDG&E, and SCG pursuant to California Public Utilities Commission program guidance. Program staff will be providing additional screening tools to assist applicants in identifying utility service territories and the program's underserved community criteria. These will be posted to the SEES website when available.

Application

- Deadlines

- 7. Can LEA's use consultants to manage their application?** Applicants are able to use third party consultants to handle their applications, however SNPFA staff are recommending in Chapter 3, Section G of the Draft Program Guidelines that the associated consulting fees will not be eligible for grant funding. Program staff are working to design a streamlined online application process intended to be able to be completed by LEA staff.
- 8. Can LEAs apply to both SRVEVR and SNPFA?** Yes, LEAs will be welcome to submit applications to both programs. Each program will require its own application and only one application may be submitted for each program in each funding round.
- 9. Can LEAs submit multiple applications?** The Draft Program Guidelines covers the number of applications that an LEA may submit for each funding round and the relationship to the SRVEVR Program applications in Chapter 1, Section D. Each LEA may only submit one application for SNPFA funds in each funding round, but the application can include multiple sites.
- 10. What is the general program timeline?** The CEC anticipates soliciting applications on or before April 1, 2021, and beginning to approve applications in May 2021. Public Utilities Code Section 1614(c) requires the CEC to adopt the Program Guidelines by May 1, 2021, and the CEC is aiming to adopt in April 2021. As stated in Chapter 3 of the Draft Program Guidelines, the CEC is proposing to

issue a notice of funding availability before each round of grants that will identify the anticipated funding to be made available, the relevant application dates, and any funding restrictions applicable to that funding round.

Skilled and Trained Workforce

- Skilled and Trained Workforce Requirements

11. What process should LEAs use for contractor bidding? SNPFA program staff are recommending that applicants will be able to use their own existing methods for choosing a contractor. Draft Program Guidelines Chapter 3, Section C explain what must be included in the estimate and Chapter 2, Section D lists the requirements a contractor must meet.

12. Is there a prevailing wage requirement for the contractors who are awarded the work? SNPFA Draft Program Guidelines follow the definition of a Skilled and Trained Workforce as defined in Section 2601 of the California Public Contract Code. These are the same requirements as the SRVEVR program. These grants may be subject to public works requirements (Labor Code Section 1720 et seq.), a requirement of which is to pay prevailing wages. Please see Chapter 2, Section F of the Draft Program Guidelines for more information.

Reporting

- Lead Pipe Testing

13. Will applicants be required to test for lead pipes? Program staff are proposing that applicants conduct testing or inspection for lead pipes while replacing eligible plumbing fixtures.

Funding

- Total Program Funding

14. What is the total available funding amount? The CEC will determine the total program budget annually as described in Chapter 1, Section C. Once CEC have determined the total program budget, a notice of funding availability will be posted.

- Double-dipping

15. Is a project eligible for SNPFA funding if it received funding from other sources? The Draft Program Guidelines cover multiple funding sources in Chapter 1, Section D. Applicants can utilize multiple sources of funding, but each scope of work must cover separate portions of the project without overlap. Any project costs covered by incentives, rebates or other funding sources are not to be included in the SNPFA application.

- Award amounts

16. Can LEAs receive reimbursement for incurred costs? The Draft Program Guidelines cover staff's proposed description of incurred costs which can be found in Chapter 3, Sections D and F. Applicants will be eligible to apply for the reimbursement of eligible incurred costs as part of their application. The incurred cost reimbursement cannot exceed 50% of the total grant amount. Once the project has been completed and the applicant submits the required final invoicing documentation, applicants may request payment for the remaining project costs, including any incurred costs above the initial 50% cap.

- Payment Process

17. What are the timeframes for LEAs to receive the grant funding? CEC staff are working to determine the estimated timeframe for applicants to receive their grant funding. These timeframes will be included in the final Program Guidelines.

SNPFA Workshop Materials and Public Comment

If there are additional questions or comments that are not addressed by the answers provided in this document, the CEC encourages written comments to inform our development of the Draft Program Guidelines. The deadline to submit written comments is 5:00 p.m. on February 5, 2021.

The CEC encourages use of its electronic commenting system. Visit the [e-commenting page](https://www.energy.ca.gov/proceedings/e-filing-and-e-commenting) at <https://www.energy.ca.gov/proceedings/e-filing-and-e-commenting>, which links to the comment page for this docket. Enter your contact information and a comment title describing the subject of your comment(s). Comments may be included in the "Comment Text" box or attached as a downloadable, searchable document in Microsoft® Word or Adobe® Acrobat®. The maximum file size allowed is 10 MB.

The SNPFA Draft Guidelines (Draft Program Guidelines), have been posted for public review and comment on the SEES Program's [Docket Log 20-RENEW-01](#), and at the following link:

<https://efiling.energy.ca.gov/GetDocument.aspx?tn=236386&DocumentContentId=69386>

Written comments may be submitted by email. Include docket number 20-RENEW-01 and "SEES Program" in the subject line and send to docket@energy.ca.gov.

A copy of the presentation and recording of the Session 2 – SNPFA Program Workshop are available on the workshop's [event page](#): <https://www.energy.ca.gov/event/workshop/2021-01/session-2-staff-workshop-school-energy-efficiency-stimulus-program-snpfa>

For any additional questions regarding the School Energy Efficiency Stimulus Program please contact SEES@energy.ca.gov.

Appendix A: Questions from Program Workshop

1. Why would SNIPFA not include water heaters and adding recirc controls to improve energy efficiency and safety?
2. Is there a rationale for excluding water heating equipment from the eligible product list?
3. Will Combi ovens be considered part of the equipment replacement eligible because of the plumbing & energy efficiency aspect?
4. "Noncompliant plumbing fixtures"...we had to retrofit our water fountains to become hands-free due to COVID requirements. This is not a water efficiency replacement, but a COVID compliance issue. Would these costs be eligible for this program?
5. Are water filters eligible for grant funding when installed to existing fixtures? Or as part of a new fixture installation?
6. Is the removal of fixtures (without replacement) eligible? For example, we are removing sink bubblers from the classroom (leaving just the faucets) as part of overall approach where we are upgrading other traditional drinking fountain fixtures to filtered hydration stations.
7. Are drinking fountains then eligible for replacement?
8. It seems to me that water quality testing (for lead and other contaminants/toxics) might also be included in eligible costs for water flows from plumbing fixtures such as all lavatories, and clothes washers, but should also include drinking fountains. Can this omission of drinking fountains be addressed?
9. Compliant fixtures frequently consume more water than the manufacturer's stated amounts due to poor commissioning by the original installation contractor. Are the costs for recommissioning and valve repairs for underperforming eligible fixtures eligible?
10. What is the District has an independent online charter school will they count in the LEA total We are 2400 ADA, but with the charter we are over 5,000 ADA
11. It seems larger Districts (10k+) will be competing for the same slice of the pie as Districts with 2-10k students. Is the breakdown of funding %s based on how many schools or students fall into each category?
12. The monies go back to projects contracted after 8/1/20 right?
13. So there is a match required by the LEA since you can only recoup up to 50% of the costs. Did I understand that correctly?

14. Understanding that the grant program/funds have been delayed due to our COVID pandemic. Will current projects or those completed during the COVID onset be approved and radioactively funded?
15. Are grants available for expenses already incurred, or for expenses not yet incurred?
16. Please consider adding the cost for auditing/investigating the need under this funding stream
17. Consultants can submit the application but there is no funding for that, correct?
18. For clarification I am in Shasta County we are serviced by the City of Redding municipality, do we still qualify for HVAC and Plumbing?
19. To follow-up on the question from the gentleman at TID, needs only one fuel supplied by regulated IOU and only having one fuel wouldn't degrade from the merit of the grant application?
20. If lead pipes are found during the final documentation stage, will there be an opportunity for additional funding to fix?
21. Am I to understand that a LEA like LAUSD only gets one bite at the apple even though they are so large and ultimately cumbersome?
22. Relationship to SNPFA Applications and Awards CEC staff anticipates that SRVEVR and SNPFA grant awards will be awarded under separate processes. LEAs may choose to participate in the SRVEVR program only, the SNPFA program only, both programs, or neither program. Each LEA may separately submit one application for SRVEVR funds and an application for SNPFA funds in each funding round
23. If speed of implementation is important, can contractors take a design-build approach with a performance guarantee to avoid having to bid against competitors which would add another design step. Many State transportation departments seem to be really successful with this approach ?
24. Regarding double dipping, I wanted to confirm that appliances/fixtures replaced through this program are also eligible for rebates and incentives from IOU funded energy efficiency programs.
25. It would be helpful if you could provide total available funding for each program.
26. How does and how fast does the contractor or consultant get paid ?
27. Is funding limited to school sites with students or can it include district offices with only staff

28. If two programs with separate CDE codes share a facility, but only one of them qualifies for an under-served community, can a shared toilet fixture (for example) be replaced by an application for that school?
29. Is there a prevailing wage requirement for the contractors who are awarded the work?
30. Are the contractors qualifications the same under SNPFA as they are under SRVEVR?
31. Does a school (LEA) have to complete an Advice Letter? Or do they wait until the actual grant application comes out in April?
32. Final draft of 4/1 and approval in May: timing seems really tight for gathering data and crafting the application.
33. Can school delegate the application process to consultant as a 3rd party ?
34. When will the compliance guidelines be provided? What is the criteria particular Code adoption or other matrix?