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February 4, 2021

California Energy Commission Docket Office

1516 Ninth Street

Sacramento, CA 95814

Re: Staff Workshop: January 22,2021 Re: Docket No. 20-RENEW-01 ; docket@energy.ca.gov

Dear Commissioners,

Thank you for the presentation of the Draft Guidelines for the School Energy Efficiency Stimulus Program (SRVEVR and SNPFA) and the opportunity to comment and offer suggestions for clarification and improvement. As a longtime CA architect with over 25 years of experience in the education/K-12 schools sector, and now sustainability consultant and advocate for climate justice, I'd like to make the following suggestions below. These are focused on the overall structure and key approaches of the Program Design in meeting both its statutory requirements AND the state's energy, climate, and equity goals wherever feasible. With some thoughtfulness, and openness to working together with a diversity of stakeholders, I believe we can improve upon this Program Design.

- (1) Adjust the Definition (4) of "Underserved Community" to read:" a neighborhood in which a public school with at least 60 percent of its student population (ADA) are/were eligible to receive free or reduced price meals under the National School Lunch Program (FRPLP, Title 1) in any of the last 3 school years, including the current year.

Reason: This lowers the bar slightly to allow more disadvantaged communities to be eligible, and also accounts for loss of ADA accounting due to the pandemic year.

- (2) Please reconsider the approach of using "LEA Application Tiers" and "Allocation of Funds Method" currently outlined in the Draft Guidelines, framework taken from another CEC grant program with IOUs as funding source. Utilize a more equitable allocation that clearly distributes funding to all most underserved schools first, as a priority, per the intent of the legislation, with a transparent, practical, and equitable formula, including a base allocation for some soft costs, assessment, any retro-commissioning and testing and balancing upfront, plus allowance for repair/ventilation/filtration improvements and contingency. As more funding is received, subsequent phases of allocation can be allocated for any major scope of work, and to the schools with the next targeted underserved tier(s), for example, those with 40-59 percent Title 1, FRPLP eligible student populations, and then those adjacent to freeways or other busy traffic corridors, and so on.

Reason: This ensures limited funding, particularly in this rushed Phase 1, is indeed "offered first and received by targeted schools in our underserved communities. The current application/eligibility and allocation of funding system is flawed in that it is purely dependent on who, or which LEA already has the capacity to even put the application together. This is a common flaw in the design of many energy efficiency or incentive programs. One advantage of the Prop. 39 Program Design was that at least the most underserved districts

were simply allocated funding (albeit based on a proxy for need,) and this was reserved explicitly for their eligible efficiency needs over the 5 years. Alternatively, there should be a way to ensure funding allocated to any LEA actually gets spent on those most impacted schools identified.

- (3) Moreover, I encourage you to look to the parts of the Program Design of the Prop. 39 Clean Energy Jobs and Renewable Energy Act that were successful in regards to “allocation” and “eligibility” or other equitable aspects. As the CEC mentioned they are already intending to identify targeted schools by geo-spatial (GIS) asset mapping, this , combined with other indicators, could identify a prioritized list from 1-10,000+ of the most impacted to the least impacted school sites, and allocate accordingly. If the funding runs out before reaching school sites with less than 10% Title 1, FRPLP students of wealthier districts, that would still meet the intent of the statute, and would be appropriate to climate justice.

Reason: The asset mapping of school site locations within LEAs, overlaid with socio-economic and other state GIS tools defining “underserved communities” such as Cal Enviro-screen and other indicators (such as Title 1 student populations of the schools) visualizes the data the state uses (and should be using) as the metrics for decision-making, especially with equity in mind.

- (4) Simplify any application process. Perhaps not make it an “opt in” by competitive application at all. Utilize the Prop. 39 methodology, and comments (2) and (3) above to develop an “opt out” process, and avoid making securing any funding a competitive process. also, provide robust outreach, education about the program, and have the CEC provide (or hire a pool of pre-qualified consultants/engineers to provide) technical assistance, and even the assessments, directly.

Reason: The program roll out can be simplified and much quicker, while ensuring funding goes to prioritized school sites in the “underserved communities” first. Simple applications , free technical assistance, and even direct assessment , where school districts that lack the capacity to even manage these sorts of facilities repairs or upgrades, can go along way in getting the appropriate scope of work done, with some level of quality control, at the under-resourced schools/districts. Again, the program should be designed to overcome these barriers of lack of capacity/bandwidth, technical expertise, and resources/funding.

- (5) Strongly encourage and provide appropriate allocation of funding for all-electric heat pump and energy (heat) recovery ventilation systems where HVAC system replacement or upgrade is called for by assessments. Include commissioning of any new systems installations or replacements within allowed budgets. Work with the CPUC to design a Public School all-electric ready rate that does not increase the energy cost burdens of that school.

Reason: To increase energy efficiency as well as improve ventilation, filtration, thermal comfort and resilience simultaneously, best leveraging SEES investments in avoiding stranded gas assets. Further a Just transition to our carbon neutral future.

- (6) Consider transformation of the CEC Bright Schools Program, served by a pool of qualified engineering firms, to leverage this and potential near future school facilities energy upgrade funding. Perhaps the Bright Schools program could be paired to

provide energy audits, decarbonization master plans, and/ or other technical assistance to eligible schools funded by SEES.

Reason: To leverage scarce funding to best serve a host of related energy systems needs at these underserved community schools by providing both technical capacity and funding for combined assessment-auditing-retrocommissioning with benchmarking and reporting standardized by the CEC. Data collected could build understanding of an inventory of school facilities that is sorely needed statewide.

Thank you for your consideration. Please feel free to contact me if you have any questions or would like to discuss these suggestions in more detail.

Sincerely,

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