

DOCKETED

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on Support

Additional submitted attachment is included below.



REDWOOD COAST Energy Authority

County of Humboldt • Arcata • Blue Lake • Eureka • Ferndale • Fortuna • Rio Dell • Trinidad • Humboldt Bay Municipal Water District

Dear CEC Commissioners and Staff:

The Redwood Coast Energy Authority (RCEA) is very supportive of AB841's goals to "save energy, create jobs in a time of economic crisis, and provide direct support to schools and school children in underserved communities." Our interest is to ensure that the implementation of the SEES programs meet these goals in our community, Humboldt County. We appreciate this opportunity to provide comments and ask questions regarding the implementation of SEES (AB841).

RCEA provides energy-related programs to all Humboldt County communities, the majority of which qualify as "underserved" under the guidelines of AB841. Most of Humboldt County falls in climate zone 1 or 2, which are characterized by mild weather and not much, if any, cooling load. Through our work with Proposition 39 funding, we assessed 24 schools and gathered data on their HVAC systems. Out of those assessed by RCEA, 20 of the 24 schools have systems that only heat their spaces and do not use air conditioning and do not have any additional ventilation beyond operable windows. Leaving windows open as ventilation leads to higher heating load and higher energy costs and makes the quality of the air entering the room an unknown.

The need to improve the air quality in the schools for COVID-19 also creates an opportunity to address the lack of ventilation in these heating-only schools. Beyond meeting the standards for reopening, overall air quality in the schools can be improved. Not allowing the grant money to be used in the first round of funding for upgrading or installing new ventilation systems at these schools would leave many of our hard to serve LEAs stranded with outdated systems and continued lack of ventilation.

We recommend that the SRVEVR program allow a mechanism for schools to use the funding to upgrade a heating only system with no outside air ventilation.

AB 841 states that "A local educational agency may apply for a grant pursuant to the program by submitting an application for reasonable costs of the HVAC assessment, assessment report, general maintenance, adjustment of ventilation rates, filter replacement, and carbon dioxide monitor installation." We request that the CEC consider that the "reasonable costs of... general maintenance" and "adjustment of ventilation rates" be allowed to include costs to upgrade the ventilation on an existing heating system with no outside air ventilation. Some examples would include adding outside air intake to a furnace system or adding an energy recovery ventilator in a classroom with a mini-split heat pump. These examples are based on real projects being implemented in our County. At the minimum,

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the windows could be upgraded with actuators and controls to adjust the openings based on the CO₂ levels in the space.

We recommend that the SEES programs address the deficiencies of a Skilled and Trained Workforce (STW) in some rural areas and allow exceptions for areas that do not currently have apprenticeship programs. RCEA intends to support the expansion of a STW in our rural communities, however we realize that our workforce as it stands today may not meet all these requirements. To create jobs in a time of economic crisis in our underserved community, we request that allowances be made so that our local workforce can complete the work required under the SEES programs.

RCEA, as a CCA, recently elected to become a Program Administrator of CPUC energy efficiency programs. We request an answer to the following question to assist with implementation in our service area: **Because the SEES programs are being considered IOU third party energy efficiency programs, if a school were to leverage RCEA's ratepayer funded rebate programs to reduce the SEES funding amounts applied for, would that be considered double dipping?** We have reviewed the answer provided by the CEC regarding not including the rebate amount in the funding applied for, however, it does not answer the question of whether rebates can be used at all if they are also funded by ratepayers.

We appreciate your time and consideration.

Sincerely,

Patricia Terry
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