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| Filer: | Karen Lee |
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LOS ANGELES UNIFIED SCHOOL DISTRICT
Facilities Services Division

February 5, 2021

DOCKET #: 20-RENEW-01

PROJECT TITLE: SCHOOL ENERGY EFFICIENCY STIMULUS (SEES) PROGRAM

Dear CEC Commissioners and Staff,

The Los Angeles Unified School District (Los Angeles Unified) appreciates the efforts by the California Energy Commission (CEC) to establish the School Reopening Ventilation and Energy Efficiency Verification and Repair (SRVEVR) Program and to solicit feedback regarding the program guidelines. We have reviewed the SRVEVR Program Draft Guidelines and provide the following comments for CEC's consideration.

1. **Definition of qualified adjusting personnel and qualified testing personnel.** We request clarification on the methods of obtaining testing, adjusting, and balancing (TAB) certifications including information on entities that offer such program and its requirements. Furthermore, we seek clarification on the ability of LEAs to use their in-house labor force (TAB certified) to perform the work funded by this grant. We seek the most cost-effective method of implementing this program, which may include the utilization of in-house labor force.
2. **Contractor estimates.** The SRVEVR program guidelines require that contractor estimates be submitted with the application. The District is requesting consideration of the use of its in-house labor force, and as such we request that district prepared estimates be considered in place of contractor estimates.
3. **Application process.** The SRVEVR guidelines authorize only one application per LEA per funding round. However, considering the complexity of the application and the number of schools within Los Angeles Unified boundaries we request that any school district having more than 400,000 pupils in average daily attendance be able to file multiple applications per funding round. In addition, we request the option for LEAs that are serviced by two different utility service providers, whose boundaries do not overlap, to be permitted to submit separate applications for each service area.
4. **Carbon dioxide monitors.** The program guidelines require that each classroom be equipped with a carbon dioxide monitor that meets specified requirements. We are requesting further clarifications on the continued monitoring of the carbon dioxide levels. We believe that District staff is best positioned not only for monitoring but also adjusting classroom ventilation rates.

5. **Definition of utility or utilities.** The definition provided in the guidelines limits utilities participating in this program to four utilities that are under the authority of the Public Utilities Commission (PUC) and does not include any municipal utilities. Therefore, school district areas that are serviced by municipal utilities are barred from participating in this program. We would like to see the program expanded to allow school districts serviced by municipal utilities to participate in the SRVEVR program.

6. **Requirement of HVAC Assessment Report.** The program guidelines indicate that grant funds can be used toward the HVAC Assessment Report. These same guidelines also indicate that actual award amount is equal to only the contractor's estimate of work. We would like clarification on whether or not grant funds can be used to cover the costs of the HVAC Assessment Reports. Additionally, we are seeking clarification as to whether grant funds can be used to cover the costs of verification reports.

7. **GHG Emission Reductions.** The improvements to systems required by this program may result in increased energy consumption. We are seeking clarification on whether or not energy savings and GHG emission reductions be a determining factor for payment upon project completion or whether this data collection is simply for CEC review for future programming purposes?

8. **Eligible applicants.** Allowing third parties to complete applications on behalf of LEAs, even though they may not sign or enter into agreements on behalf of the LEA, can lead to confusion, challenges, perceived commitments, and unrealistic expectations. An LEA has first-hand knowledge of its facilities and will be required to undertake the work and ensure compliance with the program requirements. If this option is ultimately included in the guidelines, we strongly believe that third parties should only be able to submit applications on behalf of an LEA if the application has the support of the LEA, in the form of a written letter from the LEA's primary facilities director.

Thank you for your consideration of our comments and requests. We look forward to the implementation of this program and kindly request a meeting with your staff to assist you as the guidelines are developed.

Sincerely,

Karen Lee

Karen Lee, Deputy Director
Facilities Legislation, Grants and Funding