

DOCKETED

Docket Number:	20-RENEW-01
Project Title:	School Energy Efficiency Stimulus Program
TN #:	237323
Document Title:	CAL SMACNA Comments - CAL SMACNA Comments on Staff Draft Guidelines for SRVEVR Program
Description:	N/A
Filer:	System
Organization:	CAL SMACNA
Submitter Role:	Public
Submission Date:	3/26/2021 3:48:28 PM
Docketed Date:	3/26/2021

*Comment Received From: CAL SMACNA
Submitted On: 3/26/2021
Docket Number: 20-RENEW-01*

CAL SMACNA Comments on Staff Draft Guidelines for SRVEVR Program

Additional submitted attachment is included below.



sent via email:

March 26, 2021

Ms. Natalie Lee
Deputy Director
California Energy Commission
1516 9th Street
Sacramento, CA. 95814

Re: Comments on Revised Draft Staff Guidelines for the School Reopening Ventilation and Energy Efficiency Verification and Repair Program (Docket #20-RENEW-01)

Chris Walker
Executive Vice
President

2020-2021 OFFICERS

Duane Davies
President

Hector Vargas
President-Elect

Mitch Hoppe
Treasurer

Rick Reinholz
Secretary

Wyatt Jones
Immediate Past
President

Dear Deputy Director Lee:

I write on behalf of the members of the California Sheet Metal and Air Conditioning Contractors' National Association (CAL SMACNA) to submit comment on the revised draft guidelines for the *The School Reopening Ventilation and Energy Efficiency Verification and Repair (SRVEVR) Program*, established by Assembly Bill (AB) 841 (Ting, Chapter 372, Statutes of 2020). This program is intended to provide grants to local educational agencies (LEAs) to assess, maintain, adjust, repair, or upgrade HVAC systems in school classrooms.

CAL SMACNA is a non-profit statewide trade association representing over 600 sheet metal and air conditioning contractors who employ more than 25,000 union employees and administrative personnel throughout the state of California. Our contractors and their skilled and trained workforce design, construct, balance and service energy efficient heating, ventilation, and air conditioning (HVAC) systems in residential, commercial and industrial settings.

We extend our sincere appreciation and gratitude to the Commissioners and staff who worked expeditiously to create and implement the draft SRVEVR program after the Governor signed AB 841. This program and its importance to California schools in 2021 wasn't lost on the Commission staff who produced draft guidelines for a complicated program in record time.

CAL SMACNA has the following two comments:

1. Schools w/o HVAC Systems

While the SRVEVR program speaks to assessing and ultimately repairing deficiencies in existing HVAC systems it is largely silent on how to address the ventilation needs of classrooms which do not currently have existing systems. CAL SMACNA would like to see some analysis of the number of schools/classrooms that may be omitted from this program due to the absence of existing HVAC machinery.

2. Baseline(s) for GHG Emissions Reduction and Energy Efficiency Calculations

The utility funds expended for this program are meant to be credited with the GHG emissions reductions through the repair or replacement of inefficient HVAC systems. In assessing the baseline energy use of HVAC systems in classrooms we encourage you to assume the existing systems are operating at full potential so as to meet contemporary codes and health based ventilation standards. This level of energy consumption would be calculated and then compared to the energy consumption of the repaired or replaced HVAC systems under the SRVEVR program. We further encourage you to not have individual contractors be responsible for these calculations but instead be a centralized and uniform function to be performed by CEC program staff or third party contractor.

CAL SMACNA endorses and further supports the JCEEP proposed language to amend Chapter 4, Subsection B as follows:

Chapter 4, Subsection B

PUC Section 1618 states that the reduction in greenhouse gases (GHG) and energy savings attributed to a project funded by the SEES Program shall be attributed to the utility that provided those funds when determining compliance with applicable GHG or energy efficiency saving mandates. The baseline for determining reductions in emissions of greenhouse gases and energy savings from the SRVEVR Program shall be the actual, estimated or calculated energy demand and emissions of GHG that would have occurred if the existing system was operating at required ventilation rates with the required filtration after adjustments, maintenance, repairs, and efficiency upgrades funded under the SEES Program. Energy and greenhouse gas savings are not a required element of the HVAC assessment or verification report. However, the school, contractor, and/or licensed professional shall cooperate with Energy Commission staff or Energy Commission consultants in any assessment of an individual project's energy and greenhouse gas savings, including providing access to the project site and providing project and equipment information.

Again, thank you for allowing CAL SMACNA the opportunity to comment. CAL SMACNA members look forward to working with the CEC and staff in making this SRVEVR program a true success for classroom occupants, our schools and our state.

Please do not hesitate to contact me at (916) 261-8939 if you should have questions or need additional information

Respectfully,

Chris Walker
Executive Vice President
CAL SMACNA