

**DOCKETED**

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**on School Energy Efficiency Stimulus (SEES) Program “  
Program Guidelines**

*Additional submitted attachment is included below.*



April 7, 2021

Commissioner Karen Douglas  
**California Energy Commission**  
1516 Ninth Street  
Sacramento, CA 95814

**SUBJECT: School Energy Efficiency Stimulus (SEES) Program – Program Guidelines**

Dear Commissioner Douglas,

The California School Boards Association (CSBA) is a nonprofit education association representing the elected officials who govern public school districts and county offices of education in California. We have a membership of nearly 1,000 local educational agencies (LEA), bringing together school governing boards and administrators from districts and county offices of education to advocate for effective policies that advance the education and well-being of the state's more than 6 million school-age children.

We appreciate all of the efforts of the California Energy Commission (CEC) to advance clean energy in our communities and public schools. The SEES Program provides a needed and critical resource to improve indoor air quality in eligible California public schools. This is especially valuable for the public health of students in schools exposed to high levels of air pollution and to avoid transmission of COVID-19. It also a great opportunity to reduce energy waste, increase efficiency and develop pollution-free school buildings.

While the SEES Program will provide critical support for our schools, the Program Guidelines are being developed at a time when the leadership and staff of our LEAs are working tirelessly to make sure students can safely return to campus as quickly as possible in areas that are still in distance learning, and have everything they need to be academically, social-emotionally, and physically supported. As a result, we believe there has been limited input from our LEAs to shape the Program Guidelines, with only a couple of LEAs submitting comments in the public record.

CSBA therefore requests the CEC Commissioners consider a brief delay (one to two weeks) in approving the Program Guidelines so LEAs can provide additional comments on the Program Guidelines.

CSBA also has the following additional requests for considerations within the draft Program Guidelines that center around equity:

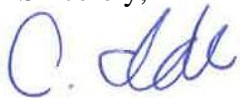
- **Additional Funding Rounds:** The program should establish three to four funding rounds per year to allow districts several opportunities to apply for funding. Funding rounds will provide the additional time necessary to complete the necessary steps required by the

program prior to application submission while preventing a handful of districts with the dedicated resources to apply for most/all the funding and leaving none for other districts that are also in need.

- **Planning dollars for Financial Hardship Districts:** Approximately 70 percent of California's schools serve a majority or near majority of low-income children with many of those same schools located in low-wealth areas that are unable to access bond funding to fulfill necessary requirements of the SEES program, e.g., system testing, contractor estimates, carbon monoxide detectors. For those districts that need upfront funding assistance, a percent set-aside of the total funding approved can be used for planning, which is currently done in the School Facilities Program for districts that qualify financial hardship/low wealth.
- **Outreach:** Outreach to both districts and education associations, which can be in coordination with the Energy Commission and the California Department of Education will help provide more awareness of these funds beyond the niche industries that have an vested interest.

CSBA appreciates the opportunity to provide comments on the SEES Program and is committed to working with you to ensure its success. If you have questions regarding our position, please feel free to call me at (916) 429-5632 or by email at [cide@csba.org](mailto:cide@csba.org).

Sincerely,



Cheryl Ide  
Legislative Advocate  
Office of Governmental Relations

Cc: CEC Chair, David Hochschild  
CEC Commissioner, Siva Gunda  
CEC Commissioner, J. Andrew McAllister  
CEC Commissioner, Patty Monahan