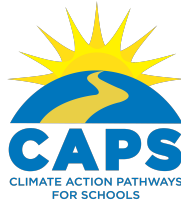


<b>DOCKETED</b>	
<b>Docket Number:</b>	20-RENEW-01
<b>Project Title:</b>	School Energy Efficiency Stimulus Program
<b>TN #:</b>	237727
<b>Document Title:</b>	Climate Action Pathways for Schools (CAPS) Comments - Recommend the CEC Set a Maximum Award per Student
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	Climate Action Pathways for Schools (CAPS)
<b>Submitter Role:</b>	Public
<b>Submission Date:</b>	5/7/2021 8:16:15 AM
<b>Docketed Date:</b>	5/7/2021

*Comment Received From: Climate Action Pathways for Schools (CAPS)*  
*Submitted On: 5/7/2021*  
*Docket Number: 20-RENEW-01*

**Recommend the CEC Set a Maximum Award per Student**

*Additional submitted attachment is included below.*



May 7, 2021

**Subject:** School Energy Efficiency Stimulus (SEES) Program Comments & Recommendations

Dear Commissioner Douglas, Commissioner McAllister and Energy Commission Staff:

Thank you for providing additional time for the public input to help the CEC shape the SEES Program for maximum impact. Climate Action Pathways for Schools (CAPS) is a California non-profit who works with under resourced public school districts to develop projects that reduce greenhouse gas emissions while providing work-based-learning opportunities for students to implement those projects. Below is follow up comments on the topics covered during the workshop.

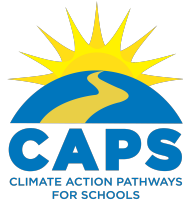
#### **Funding Award Allocations and Consideration of Maximum Grant Awards**

**Comment:** The initial funding round is limited to providing schools HVAC Assessments, CO2 sensor installations, corrective maintenance and a 20% contingency. Though this eliminates funding for the many upgrades needed, a comprehensive HVAC assessment, including the installation of indoor air quality sensors, is a crucial step in preparing a plan for those schools needing major or ‘deep’ HVAC upgrades, and thereby readying those schools for future AB841 funding rounds and other utility, local, state and federal funding opportunities (i.e., the American Rescue Plan; the Coronavirus Response and Relief Supplemental Appropriations Act).

**Recommendation:** As the initial round is limited in scope, to fund the most possible schools in underserved communities, ***we recommend the CEC limit awards to a maximum grant, using a per student allocation.*** In addition to funding the most possible schools, another benefit of setting a maximum allocation is in helping ensure that the initial funding is not subject to abuse. LEAs are not necessarily bound to require, and may not have adequate time to acquire, competitive proposals. We could imagine a scenario where ‘school district A’ pays \$100,000, and ‘school district B’ pays \$200,000 for the same scope of work. Limiting the LEAs to a reasonable maximum allocation will help prevent unfair distribution of funding and abuse.

#### **Reasonable Costs for Assessment and Maintenance Grants**

**Comment:** We completed an estimate for 22 schools in the Central Valley for the scope of work covered by the initial funding round. The average cost for the high schools was \$53 per student for high schools and \$76 per student for elementary and middle schools.



**Recommendation:** Based on the above estimates, adding a 20% contingency, and a 10% additional buffer, ***we recommend the maximum grant award amounts as follows:***

- ***\$70 per high school student***
- ***\$100 per elementary & middle school student***

This would provide ~\$50,000 for the average elementary school, ~\$75,000 for the average middle school and ~\$90,000 for the average high school.

**Other**

**Recommendation:** The CEC should permit LEAs to use all available resources to complete the Initial Round SOW, including contractors, engineers, consultants and/or internal staff, provided all are properly licensed and qualified to complete the work.

Sincerely,

**Climate Action Pathways for Schools**

A handwritten signature in black ink that reads "William T. Kelly". The signature is written in a cursive style with a large, stylized initial "W".

William T. Kelly, P.E.

President & Founder

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