

**DOCKETED**

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*Comment Received From: Chris Ing Consulting  
Submitted On: 5/7/2021  
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**Chris Ing Consulting - Comments on AB 841- SRVEVR Program**

*Additional submitted attachment is included below.*



May 7, 2021

California Energy Commission  
1516 Ninth Street  
Sacramento, CA 95814

**RE: Docket 20-RENEW-01, Comments on AB 841, School Energy Efficiency Stimulus (SEES) Funding Program**

Dear Energy Commissioners and Staff,

Thank you for the opportunity to submit comments regarding the School Energy Efficiency Stimulus Funding Program. I have been tracking this program closely and have utilized my considerable experience working with 140 LEAs/(\$37M) in Prop 39 (Clean Energy Jobs Act) to derive cost estimates for the work prescribed under AB 841. My experience and resulting estimates based on this first-hand project knowledge inform my comments and recommendations herein.

My first comment pertains to the 'allocation of funds method' whereby 80% of available funding is allocated to Tier 3 LEA's - those with 5000+ ADA. This approach results in structural inequities whereby the majority of program funding is allocated to the largest Districts, not necessarily those school sites in the disadvantaged communities the program purports to target. As an example, almost all public charter schools, many of which are located in (or otherwise meet the criteria for) disadvantaged communities, are Tier 1 schools. These schools and all smaller Districts will therefore be disproportionately underfunded through the program. Additionally, if the CEC has the latitude to consider pooling funds throughout all participating IOU service areas, this approach will likewise result in more equitable distribution of funds.

Secondly, the CEC could consider a prescriptive approach whereby funds are allocated on per-student or per-school size (gross floor area) basis. Given the broad range of school facility vintage, equipment, and size, a \$-per-student approach may be preferable. Funding would then necessarily be capped per LEA based on the selected metric(s).

In preparing cost estimates for approximately two dozen (24) Southern California LEAs (located throughout LA, Orange and San Diego counties), the following average \$/student costs were derived. Note these estimates are inclusive of the 20% contingency funds stipulated in the guidelines.

- Elementary & Middle School - \$95/student
  - Resulting in a range of ~\$52,000 - \$72,000 funding per average elementary/middle school
- High School - \$85/student
  - Resulting in ~\$125,000 funding per average high school

An approach such as the above would ensure a more fair and equitable dispensation of funding while still allowing the Energy Commission to meet its obligations regarding disadvantaged communities. I am grateful for the opportunity to submit these comments on behalf of the California LEAs and students who stand to directly benefit from this program.

Respectfully,

A handwritten signature in blue ink, appearing to read "Chris Ing".

Chris Ing, M.A., C.E.M.  
President