

**DOCKETED**

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*Comment Received From: Thelma Briseno  
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## **Climate Resolve**

*Additional submitted attachment is included below.*

September 30, 2022

California Energy Commission  
1516 Ninth Street  
Sacramento, CA 95814

Dear CEC Commissioners and Staff:

Thank you for the opportunity to provide you with comments and feedback on the Electric School Bus Bi-directional Infrastructure Funding Concept. Climate Resolve focuses on building-up Southern California's communities that are most vulnerable to climate change through both mitigation and adaptation strategies. Our comments below reflect our experience in working with school districts located in disadvantaged communities throughout Southern California.

- Are there any technology requirements stakeholders feel must be accounted for regarding the electric bus or EVSE?
  - Based on Climate Resolve's previous work with school districts, abandoned or non-functioning solar systems should be repaired and tied into the new proposed EVSE infrastructure.
  - In order to maintain a resilient infrastructure for vulnerable school districts, critical load panels and back-up battery storage should be incorporated into the EVSE infrastructure.
- What are stakeholders' thoughts on upgrading battery electric school buses to be bi-directional, including hardware and software?
  - Climate Resolve is completely supportive of the idea. We believe that it provides a cost-effective, efficient solution to foster clean energy resilience at school districts.
- Thoughts on 10 bus or battery capacity minimum requirement?
  - For equity reasons, we believe that this minimum should be less than 5 buses.
  - As opposed to a specific number, it may be more reasonable to equate the number of buses or battery capacity to the energy needs of the school campus so that there is enough capacity to maintain critical loads of the campus while also providing the benefits of bi-directional feeds.
  - Moreover, the supply chain for EV buses is severely backlogged, so districts that could participate on a reasonable timeline may be only those districts that currently have EV buses
- General thoughts on the funding concept?
  - Climate Resolve strongly recommends that the concept focuses on supporting school districts that meet a criteria for equity. For example, other state programs have set an equity threshold for schools and school districts in which more than 75% of the student populations are eligible for free and reduced price meals

(FRPM). Based on this criteria, Climate Resolve has identified 66 school districts within SCE's service area that would be eligible as equity projects. These 66 school districts include nearly 2,250 schools and more than 1.25 million students within SCE's service area.

- If installing infrastructure at multiple sites, is there a feeling of how many should be in a Tier 2/3 Fire Threat District?
  - Given the limited funds in this program, Climate Resolve recommends that the geographic focus should be on school districts that serve under-resourced communities, rather than Tier 2/3 fire threat districts. For example, residents of these school districts may be at risk of wildfire smoke, but may not have HVAC systems that enable them to shelter in place at home. Instead, their schools may be the only place where their children can remain safely in air conditioned spaces. Smoke inhalation is particularly risky for children, and many kids in under-resourced communities have asthma. Moreover, under-resourced communities tend to be in areas where the electrical grid is due for upgrades and is currently fragile, so these school districts need backup power. For these reasons, Climate Resolve recommends that the focus should be on equity rather than fire threat.
  
- General thoughts on match share?
  - For school districts that satisfy the equity criteria, the match share requirement should be eliminated. These school districts naturally do not have the resources to be able to afford 25% match funding for this program; they are barely able to afford to pay for their basic operations. Other state grant programs eliminate the match share requirement for schools that satisfy equity criteria.

Again, thank you for giving Climate Resolve the opportunity to submit these suggestions and comments with respect to Medium- and Heavy-Duty Zero-Emission Vehicles and Infrastructure.

Sincerely,

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