

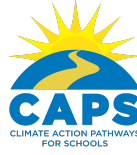
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Climate Action Pathways for Schools (CAPS) Comments

Additional submitted attachment is included below.



January 26, 2023

CalSHAPE Program Team
 California Energy Commission (CEC)
 1516 Ninth Street
 Sacramento, CA 95814

Dear CEC CalSHAPE Program Team,

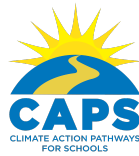
Climate Action Pathways for Schools (CAPS) is pleased to offer feedback to on the proposed CalSHAPE Upgrades and Repairs (U&R) grant related to two aspects of the program:

1. Allocations rather than a Competitive Application Process
2. Support of inclusion of an Electrification Requirement

Allocations rather than a Competitive Application Process. As the CEC is certainly aware, there will be a much greater need for U&R grants than the available funding (~\$192M).

Nonetheless, the funding can have a significant impact, and will be a big help to LEAs. To maximize impact, we recommend the CEC consider, in the U&R round, using an allocation process rather than a competitive application process. One way this could work would be having every disadvantaged school participating in the Assessment phase (through the end of Round Four) qualify for an allocation based on the number of classrooms in its disadvantaged schools. A sample calculation is provided below:

SAMPLE U&R Grant Application	
Disadvantaged schools in CalSHAPE assessment program thru Round 4 (estimate assumes approximately 40% of the 3,643 current school participants are disadvantaged schools)	1,500 (qualifying schools)
Average # of classrooms per school (estimate is a blend of primary and secondary)	35 (average classrooms per school)
Estimated total qualifying classrooms (qualifying schools times avg. classrooms/school)	52,500 (qualifying classrooms)
Estimated available funds (provided in CEC workshop)	\$192,000,000 (available funds in U&R Budget)
Estimated U&R allocation per classroom (Available funds divided by qualifying classrooms)	\$3,700 (allocation per classroom)



This allocation calculation would need to be completed by the CEC for each IOU, so is provided as just an illustration. Once an allocation is established, the CEC could provide that allocation to every LEA with a qualifying disadvantaged school. A sample LEA allocation is provided below:

Sample LEA Allocation Calculation	
# of ACME USD's disadvantaged schools in CalSHAPE Assessment Program	10
# of classrooms in those disadvantaged schools	350
U&R Allocation per classroom	\$3,700
CalSHAPE allocation for U&R grant	\$1,295,000

The LEAs would then be provided flexibility to use that allocation in its highest need school buildings provided the school(s) selected by the LEA qualified for a U&R grant, including having completed the assessment and established the upgrade and replacement need. As an example, in the example above, the LEA could use its \$1,295,000 allocation to replace HVAC at 1 or 2 of its 10 school sites. In this manner, the CEC would enable every LEA with participating disadvantaged schools to be eligible for funding in the U&R phase, and the flexibility to use U&R funds to meet its highest priorities. The LEA might also match their CalSHAPE U&R grant with other available funds (e.g. federal ESSER funding) to accomplish additional needed upgrades, expanding the influence of CalSHAPE.

Electrification. CAPS strongly supports limiting U&R grants for HVAC unit replacements to fully electric systems (for example, high eff. heat pumps). The reasons we support this requirement:

- Without transitioning away from natural gas heating in buildings, it will be extremely difficult for California to meet its GHG reduction goals (for example, 40% by 2030)
- There is considerable innovation in the HVAC industry in advancing towards all electric HVAC systems, and those advancements can be bolstered by programs like CalSHAPE. ([see ASHRAE position paper on building de-carbonization, with 'energy efficient electrification' a primary means](#))
- For classrooms which have air conditioning and gas heating (for example, rooftop packaged units or split systems), there are all electric heat pump replacements options which can be designed and installed at a comparable first cost to a gas-electric replacement.

Sincerely,

Bill Kelly, P.E.
Founder and Director of Energy & Sustainability
Climate Action Pathways for Schools

Kirk Anne Taylor
Executive Director
Climate Action Pathways for Schools