

DOCKETED

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April 12, 2023



Commissioner Andrew McAllister
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

**Re: Comments on CalSHAPE Ventilation Program Draft Commission Guidelines,
Third Edition (Underline Strikethrough Version)**

Dear Commissioner McAllister:

On behalf of Rewiring America and UndauntedK12, we thank the California Energy Commission (CEC) for the opportunity to comment on the CalSHAPE Ventilation Program Draft Commission Guidelines. **We write in strong support of the CEC proposal that CalSHAPE HVAC Upgrade and Repair (U&R) Grants be used for only the installation of all-electric equipment, and we argue that funding should be prioritized for schools in underserved communities.**

Recommendations

- 1. Identify U&R grant eligible schools in underserved communities based on those in underserved communities who have already received an A&M grant and conduct outreach to them rather than requiring further applications. All funding should go towards underserved communities.** To qualify for U&R funds, Local Education Agencies (LEAs) must have already received an Assessment & Maintenance (A&M) grant and submitted their report. CalSHAPE has the relevant data it needs to identify which LEAs would benefit most from upgrade funding without requiring the schools to go through another application process.

The Guidelines establish that at least 25 percent of approved projects will be located in underserved communities. The allocated funding will help around 80-190 schools, depending on project cost. Given that CalSHAPE now has an assessment for around 4,000 of California's 10,000 schools, we believe the goal should be that 100 percent of approved projects be located in underserved communities, as these schools are least likely to be able to fund needed HVAC repairs, upgrades, and replacements without support from CalSHAPE. If CalSHAPE moves forward with the established application process, we encourage that the first round of U&R funding be limited to underserved communities, as was proposed in the January 12th, 2023 workshop.

2. **Spread the funds wide.** The goal of the program should be to reach as many individual districts as possible. Giving districts all-electric HVAC upgrade experience will help enable them to plan for upgrading all of the buildings in their district. Focusing on a small number of districts with many schools will isolate that experience, rather than encouraging further upgrades throughout the state.
3. **Make the A&M data publicly available.** We urge CEC to make all U&R data publicly available, so that it can be used by other entities looking to understand the California school facilities landscape and provide more support to schools, such as Rewiring America and UndauntedK12. The data is a public record and should be made accessible as such. We are frustrated that we cannot access this public data and would greatly appreciate being able to partner with the CEC to access the data.

The U&R all-electric replacement requirement will lead to a reduction in the state's greenhouse gas (GHG) emissions, healthier and more resilient environments for students, staff, and communities, and year-over-year savings for schools. Rewiring America and UndauntedK12 encourage CEC to consider and follow the above recommendations, and lead the way for all California schools to go all-electric while helping to meet the state's climate goals. Overall, we wish to applaud the CEC for its outstanding leadership on school electrification.

Sincerely,

A handwritten signature in black ink, appearing to read "Ari Matusiak". The signature is fluid and cursive, with a long horizontal stroke extending to the right.

Ari Matusiak
CEO, Rewiring America

A handwritten signature in black ink, appearing to read "Jonathan Klein". The signature is cursive and elegant, with a large initial "J" and a long horizontal stroke.

Jonathan Klein
CEO, UndauntedK12