

DOCKETED

Docket Number:	20-RENEW-01
Project Title:	School Energy Efficiency Stimulus Program
TN #:	236539
Document Title:	Energy & Sustainable Services Schneider Electric - AB841 SNPFA Questions & Comments
Description:	N/A
Filer:	Chester Hong
Organization:	California Energy Commission
Submitter Role:	Commission Staff
Submission Date:	2/1/2021 10:27:34 AM
Docketed Date:	2/1/2021

Date: February 1st, 2021
Docket #: 20-RENEW-01
Project Title: School Energy Efficiency Stimulus Program

Dear CEC Staff and Commissioners,

Thank you for receiving feedback and questions regarding AB841 and how the CEC will be administering the SNPFA program. Schneider Electric has compiled the following questions and suggestions after reviewing the legislation, initial guidelines, and attending the workshops.

1. For the SNPFA Program, we request that grant funds be made available up front, similar to how the SRVEVR program is designed. Having the 50% reimbursable amount be only for incurred costs deters smaller and disadvantaged LEAs who do not have funds to begin the fixture & appliance replacement process from participating in the program.
2. It would also benefit the SNPFA program to have a contingency amount available. Aside from covering unforeseen conditions or increases to the estimate pricing, the contingency could be used for upgrades such as contactless faucets, valve repairs, lead pipe replacements, etc.
3. Is it intended that no funding is being provided to third parties to help LEAs to handle all the grant work, project scoping, procurement, and project management? Many LEAs have little time or ability outside of their already busy workload to fully manage this new grant program. Is it possible for the grants to include costs of third-party management? This may be more than stand-alone services but also expand to the turnkey design and building of the improvements. Perhaps this could be done similar to the Prop 39 planning funds to help make the program easier for LEAs to implement and relieve any financial burden they may have in participating in this program. This also assumes that LEAs have an up-to-date plumbing fixture inventory per site for the initial application. LEAs may need help pulling this together from third parties in order to submit for funding.
4. We recommend removing the requirement that grant money (and contingency) is allocated per site. This flexibility will allow LEAs to get more accomplished if they can allocate funding across the sites included in the application. Initial contractor estimates may not be accurate, and this will allow the LEA to shift money around per site, to the biggest needs, based on what the in-depth fixture and plumbing assessment produces. This will also help reduce the need for LEAs to competitively apply for more funding if one or more of their sites comes up short on funding and can't complete the work.

Thank you again for your consideration on the above items.

Daniel Cotten
Project Development Manager
Schneider Electric
daniel.cotten@se.com