

DOCKETED

Docket Number:	20-RENEW-01
Project Title:	School Energy Efficiency Stimulus Program
TN #:	236540
Document Title:	Energy & Sustainable Services Schneider Electric - AB841 SNPFA Questions and Comments
Description:	N/A
Filer:	Chester Hong
Organization:	California Energy Commission
Submitter Role:	Commission Staff
Submission Date:	2/1/2021 10:30:24 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 SRVEVR program. Schneider Electric has compiled the following questions and suggestions after reviewing the legislation, initial guidelines, and attending the workshops.

1. Will the program require ALL scope listed in the guidelines to be done within SRVEVR (HVAC assessment, General Maintenance, Filter Replacement, CO2 Monitors, etc.) in order to be awarded funds or reimbursed for work completed? For example, can an LEA get reimbursed or awarded for only completing the HVAC Assessment, only installing MERV 13 filters, only installing CO2 monitors, or some sample of the overall scope?
2. Additionally, if the idea is an all-or-nothing approach, our team foresees the installation of CO2 monitors in every classroom as taking up a large chunk of the overall project funding, while not directly helping improve the indoor air quality of the school. We ask that the CEC reevaluate the CO2 sensor if this is indeed a requirement for every SRVEVR funded project.
3. From the legislation: "The local educational agency receiving a grant shall install filtration with a minimum efficiency reporting value (MERV) of 13 or better in the local educational agency's HVAC system where feasible". Can the CEC provide more information on "or better" with respect to MERV 13 filters? Could the installation of Needle Point Bipolar Ionization or Ultraviolet Germicidal Irradiation (UVGI) be paid for with AB841 funding?
4. The guidelines state "The initial grant awards do not include additional funding for repairs, upgrades, or replacements above the 20% contingency amount". Will future grant awards allow for the request of more funding above the 20% contingency amount, in the first application, if the LEA has already identified more extensive repairs, upgrades, or replacements? **Or will there always be a requirement for additional applications to be awarded for funds above the 20% contingency?**
5. To confirm, is 25% or 35% of the overall SRVEVR budget going towards underserved LEAs? Also, does this percentage include sites that are within 500 ft of a freeway or 'busy traffic corridor' and would those sites be eligible to apply for the first round of funding?
6. Although rare, we have seen LEAs that have sites in two different IOUs, i.e., a school in PG&E territory and another school in SCE territory. How would the application and budget work for an LEA that is on the border of two IOUs?
7. We suggest that the CEC does not hold 50% of the funding until after the project is completed. This puts the LEAs in a situation where they must pay for work up front and then get reimbursed. In the economic environment we're in, with COVID-19 and budget cuts, this could discourage LEAs, especially smaller or underserved LEAs, from pursuing AB841 projects. Unused funds may be repaid back from the LEA once the CEC has reviewed and confirmed pricing and scope in the final documentation.

8. 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 mechanical inventory per site for the initial application. LEAs may need help pulling this together from third parties in order to submit for funding.
9. 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 HVAC 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.
10. The guidelines show funding only for the IOUs: SCE, PG&E, SDG&E, SoCalGas. Can the CEC confirm that no municipal utilities, such as LADWP or SMUD, will be participating in this program?

Thank you again for your consideration on the above items.

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