

DOCKETED

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Date: February 1st, 2021

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Dear CEC Staff and Commissioners,

The proposed School Reopening Ventilation and Energy Efficiency Verification and Repair (SRVEVR) component of the School Energy Efficiency Stimulus (SEES) Program assumes that a school has an HVAC system - meaning a system providing Heating, Ventilation, and Air Conditioning. But many classrooms in California are only equipped with a heating system. There is no mechanical air conditioning for the classroom and the only ventilation that may be provided, if at all, would be through "operable" windows.

Although a classroom may have operable windows, they are often not opened for multiple reasons:

- too much noise from a nearby highway
- too much noise from a playground next to or below the classroom
- the window blinds are drawn to keep out the sun
- wildfire smoke makes the air outside the window worse than the air in the classroom.

Even should a classroom's windows be opened, there is no guarantee of proper ventilation as there is probably a closed door in the wall opposite the windows such that there is no flow through ventilation. Further, if there is some degree of flow-through ventilation provided by windows, the outside air is not being filtered.

This lack of ventilation in heating-only classrooms systems can be quickly and easily remedied with energy-efficient ventilation systems that would also provide free cooling and heat recovery to the classroom depending on outdoor air conditions. Even in older, multistory school buildings with concrete floors and ceilings, per-classroom energy/heat recovery ventilators can be installed on classroom ceilings that would provide MERV-13 filtered, temperature-adjusted fresh air to classrooms. I suggest that these systems be considered as worthy of grant money for schools that have no existing ventilation system besides operable windows.

Thank you for your consideration.

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