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**Comments on SRVEVR Program Draft Guidelines Presented at the
January 22, 2021 Workshop**

Additional submitted attachment is included below.



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Docket No. 20-RENEW-01
California Energy Commission
Dockets Office MS-4 1516
Ninth Street Sacramento, CA 95814-5512
School Energy Efficiency Stimulus Program

Re: Comments on SRVEVR Program Draft Guidelines Presented at the January 22, 2021 Workshop

Dear Commissioners and Staff:

I am writing on behalf of the National Energy Management Institute (NEMI) to comment on the Draft Guidelines for the School Energy Efficiency Stimulus Program (“SRVEVR Program”) presented at the January 22, 2021 Staff Workshop and to respond to several questions that were raised by stakeholders at the workshop.

A. Application of AB 841 standards where there is no existing mechanical ventilation or where the existing mechanical ventilation is non-operational or requires replacement in order to meet standards.

NEMI supports adopting the following Method of Procedures (MOP) to apply to school buildings in cases where there is limited or no existing mechanical ventilation, the assessment would then focus on available options and provide the design professional with documentation to provide ventilation options with limited assumptions.

1. Verify the functionality and document nameplate data on any existing HVAC equipment (i.e., heating only units, exhaust fans, etc.)
2. Verify and document the location of windows and doors that can be opened.
 - a. Verify if windows have any switches or controls that initiate exhaust fans, motorized dampers or other devices that operate to provide free cooling.
3. Verification or installation of the CO_2 sensor.
4. Contact the licensed professional to determine what additional information will be of assistance in considering the addition of mechanical ventilation. The licensed professional may consider multiple options including putting the building into a negative, operable windows, adding Outside Air (OSA) inlets to existing equipment, or adding new mechanical ventilation units.



- a. Verify locations for potential installation and identifying physical limitations.
- b. Verify existing mechanical, architectural, structural drawings match current conditions.
 - i. Provide a sketch of actual roof penetrations, penetration type (i.e., vent pipe) and approximate locations if different from drawings.
- c. Verify locations of any vents that could contaminate Outside Air (OSA) intake locations.
- d. Photographs of existing building and potential locations for mechanical ventilation equipment.
- e. Document roof and wall type/material to the best of the technician's ability.
- f. Verify if existing mechanical equipment can be altered to accept Outside Air (OSA) or if a Dedicated Outside Air System (DOAS) is required.
- g. Obtain information on central plant capacity (if applicable)
- h. Document whether the school is within 500 feet of the edge of the closest traffic lane of a freeway or other busy traffic corridor, as defined, or within 1,000 feet of a facility holding a specified permit issued pursuant to the federal Clean Air Act, or whether other outside air conditions may make reliance on windows or other sources of non-filtered outside air potentially hazardous to occupants.
- i. Document recommendations for adding mechanical ventilation and filtration where none currently exists or for replacing a mechanical ventilation system where the current system is non-operational or is unable to provide recommended levels of ventilation and filtration.

B. Funding for Portable Filtration and Air Cleaning Devices

At the workshop, a stakeholder asked whether AB 841 funding could be used to install portable filtration and air cleaners. NEMI does not oppose portable air filtration, but they should only be used as a temporary supplement to building ventilation systems where the desired indoor air quality cannot be achieved due to unusual conditions. Portable filtration and air cleaners are not addressed in the initial assessment, adjustment and minor repair and upgrade provisions of AB 841 because the need, usefulness and cost-effectiveness of portable filtration and air cleaners cannot be determined until after the initial assessment. The licensed professional may include the addition of a portable filtration and air cleaner in his or her recommendations for additional work that would be covered under the 20% contingency funding or under the additional funding that may be available pursuant to Section 1621(c)(2).

C. Funding for Private Consultants



At the workshop, a stakeholder asked whether AB 841 funding would cover the costs of hiring a private consultant to put together the application for funding.

The Energy Commission has expressed that the application will be simple and intuitive. Furthermore, most of the information needed for an application would be provided by the bidding contractor. The contractor preparing the bid would provide the required technical information, including:

- Amount of equipment
- Type of Equipment
- Estimated cost to perform the HVAC assessment, assessment report, general maintenance, adjustment of ventilation rates, filter replacement, and carbon dioxide monitor installation required under sections 1623 to 1627, plus an additional 20% for contingency work related to repairs, replacements, or energy efficiency upgrades.

While a LEA is welcome to include private consultants in this process, this added layer of cost was not the intention of AB 841. Private Consultation is not required and shall be used at the discretion of the LEA with funding outside of the AB 841 grants. The limited funding of AB 841 shall be reserved for direct assessment improvements of the HVAC infrastructure as outlined in AB 841.

D. The 20% Contingency Funding Should Apply to Work on an Entire School Campus or School District, Not Each Unit.

At the workshop, stakeholders asked whether the 20% contingency funding for minor repairs or energy efficiency upgrades would apply to each unit, each school campus or as an aggregate of all the school sites covered under an LEA's application. Staff indicated that they interpreted this as applying to each unit. NEMI disagrees with this interpretation. Section 1621 of AB 841 refers to applications by LEAs and states that the grant to the LEAs shall include an additional 20 percent for repairs, upgrades, or replacements necessary to make the system functional or more energy efficient. NEMI reads this as to provide a 20 percent contingency for the entire grant to the LEA that it may target to whichever systems that require additional repairs or energy efficiency upgrades, not that it gets broken down by each HVAC unit.

Thank you for your continuous efforts to solicit public comments and consider them in the administration of the programs you are responsible for.

A handwritten signature in black ink, appearing to read 'Christopher Ruch'.

Christopher Ruch
Director of Training
NEMI