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**Empowered Solutions Comments - School Energy Efficiency
Stimulus Program - SVEVR**

Additional submitted attachment is included below.

Re: Draft School Reopening Ventilation and Energy Efficiency Verification and Repair (SRVEVR) Program Guidelines

Honorable Commissioners and Commission Staff,

We are thankful for the opportunity to participate in the development of the School Energy Efficiency Stimulus (SEES) Program's Draft School Reopening Ventilation and Energy Efficiency Verification and Repair (SRVEVR) Program Guidelines. Empowered Solutions is an energy, commissioning, and controls firm that works with public institutions throughout California. Since our forming in 2013, we have successfully work with over 40 LEAs and hundreds of their schools through numerous programs, including Proposition 39. We, and the LEAs we serve, appreciate your vision and recognition of the need for assistance in order to safely, quickly, and efficiently open our schools. Further, we appreciate the stakeholder comments that have been provided and we respectfully provide our own, below.

We join in the recommendation that the application of the 20% contingency funding be applied to the entire campus for which grant funding is achieved, and not on a per-unit basis as Staff has suggested. Allowing the funding to be used across the entire group of identified repairs, upgrades, or replacements allows for the flexibility needed to account for changes in final costs due to unforeseen conditions and market fluctuations.

As we found by working with dozens of smaller LEAs through the Proposition 39 program, the greatest barrier to the program was the program application, reporting process, and concerns over measure implementation pricing. The use of funds should allow for LEAs to hire professionals to help the LEA meet the application, bidding, and reporting obligations the program, and to assist with planning for future years. The pandemic has left many LEAs significantly strapped for budget, personnel, and time. Rural LEAs often find it very difficult to attract contractors to their distant locations. Allowing funding for professionals will also enable expert engineers to evaluate control systems and assess the need for improvement at the system level, rather than at the unitary level. By not allowing the LEAs the funding flexibility to hire professionals to help administer the grant process, smaller LEAs, and those in rural or underserved communities, will likely find it difficult to participate. To address this, we recommend that a set-aside of planning funds be established for each LEA, similar to the Proposition 39 Program.

We suggest expanding the Skilled and Trained Workforce requirements to include qualified professionals that carry other licenses and certifications, such as Licensed P.E., LEED AP, and CCP. This would allow these uniquely certified and highly qualified professionals, who are attuned to assessing and addressing HVAC ventilation and controls systems, to provide a greater holistic and comprehensive engineering approach to improving those systems.

We recommend that the initial program funding be increased well beyond the initial 50% to help ease the payment for initial repairs, adjustments, and procurement of materials. Limiting the payment to 50% may force LEAs to pre-pay certain expenses, leading to an inability to transact due to lack of funding.

Proper controls adjustments and sequencing is imperative for systems that monitor and manage ventilation equipment, such as DCV and CO2 monitoring. We recommend that controls programming, and EMS repairs, upgrades, or replacements be specifically included by name in the initial grant funding list of allowed activities to mitigate potential confusion in the future.

We have seen first-hand that there are many LEAs who take service from a combination of energy providers. We recommend that the Commission clarify in the guidelines that if the LEA's school for which a grant is being requested takes service from at least one of the four Investor-Owned Utilities, that site's use of funds will satisfy PUC Section 1615(c).

Thank you for your consideration.

Shea Dibble
Partner / Sr Vice President