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South Energy AB841 Comments

Additional submitted attachment is included below.

Southland Energy appreciates the opportunity to provide the following questions and comments with respect to the Schools Energy Efficiency Stimulus Program.

- As the Energy Commission considers making changes to the existing guidelines as questions and comments are submitted, Southland believes the guidelines as they exist today are well-written towards implementing a straight-forward program that should accomplish more work without becoming overly complicated. In general, we believe that the current approach will allow LEAs to use any approved AB841 funds for maximum project value. We recommend making minimal guideline changes.
- We commend you for not specifying procurement requirements, and leaving that distinction to LEAs to use their existing procurement policies for maximum flexibility.
- We also commend you for developing the program to allow the trades to work directly with professional engineers on HVAC assessments without the added complication of consultants. This approach which will keep cost and overall time spent at a minimum, and ensures the integrity and intent of the project design once implemented.
- Please clarify whether HVAC assessments can be accomplished by Mechanical and Plumbing Contractors during the same onsite assessments. Streamlining this effort would shorten the timeline and decrease the overall cost, making more efficient use of available funding.
- During the Session 1 Workshop, there was a comment that CEC is considering establishing prescriptive pricing for the assessments for both subprograms. If CEC establishes a prescriptive pricing scale for assessments, please consider a time allocation for tradesman to take inventory and investigate existing conditions of equipment. This should be in addition to the time allocation for a licensed professional obtaining system performance data as described in the HVAC assessment prescriptive process and requirements.
- Please clarify how funds have been divided based on the service territory. Is there a percentage breakdown available showing the distribution across the PG&E/SCE/SCG/SDG&E territories?
- If an LEA is in So Cal Gas or PG&E/SPURR service territory and receives gas service, but receives electric service from a municipal provider, would that LEA qualify for grant funding through SEESP? Would there be any limitations or exclusions based on these factors?
- Many of the prescriptive improvements that need to be made are to be made via SEESP may, and likely will increase energy consumption. Will LEAs be subject to any type of penalty for increased energy consumption?
- Can an LEA submit an application with sites that qualify as disadvantaged, and also include sites that do not qualify as disadvantaged in order to establish priority for approval and funding in subsequent program years?

Thank you,

Dominic Cardenas

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