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CEDMC comments on School Energy Efficiency Stimulus Program

Additional submitted attachment is included below.

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CEC docket 20-RENEW-01 – CEDMC comments on School Energy Efficiency Stimulus Program

The California Efficiency + Demand Management Council (“The Council”)¹ appreciates the California Energy Commission’s (“CEC”) efforts to implement the School Energy Efficiency Stimulus Program. The Council is pleased to offer these comments on the implementation of that program.

I. Background

The Council is a statewide trade association of non-utility businesses that provide energy efficiency, demand response, and data analytics services and products in California.² Our member companies employ many thousands of Californians throughout the state. They include energy efficiency (“EE”), demand response (“DR”), and grid services technology providers, implementation and evaluation experts, energy service companies, engineering and architecture firms, contractors, financing experts, workforce training entities, and manufacturers of EE products and equipment. The Council’s mission is to support appropriate EE and DR policies, programs, and technologies to create sustainable jobs, long-term economic growth, stable and reasonably priced energy infrastructures, and environmental improvement.

II. Local Education Agencies Should Be Allowed to Collaborate with Energy Service Consultants for Identification, Evaluation,

¹ The views expressed by the California Efficiency + Demand Management Council are not necessarily those of its individual members

² Additional information about the Council, including the organization’s current membership, Board of Directors, antitrust guidelines and code of ethics for its members, can be found at <http://www.cedmc.org>. The views expressed by the Council are not necessarily those of its individual members.

and Implementation of Projects Funded by the School Energy Efficiency Stimulus Program

The Council recommends that Local Education Agencies (“LEAs”) be allowed to work with energy service consultants to support the identification, evaluation, and implementation of AB 841 School Energy Efficiency Stimulus (“SEES”) Program projects. LEAs requested this path be made available in the AB 841 Plan during the CPUC SEES Program workshop held January 22, 2021. This came up in both sessions addressing the School Reopening Ventilation and Energy Efficiency Verification and Repair Program (“SRVEVR”) and School Noncompliant Plumbing Fixture and Appliance Program (“SNPFA”) elements and CEDMC strongly supports the approach.

Allowing LEAs to use SEES Program funds to work with consultants will increase accessibility of this program to all LEAs and remove LEA staffing burdens since many LEAs do not have resources to support these types of projects. Additionally, some LEAs do not have the expertise to navigate these programs and should be able to call on experts to access funds and implement projects for energy and water efficiency and safety projects.

During implementation of Prop 39, the CEC has commendably allowed LEAs to work with consultants on developing projects. Similarly, The AB 841 Plan should allow LEAs to work with consultants on the SEES Program and use AB 841 funds to support this work.

III. Conclusion

The Council appreciates the opportunity to provide comments on this important issue. Based on the arguments presented above, The Council recommends that the Energy Commission adopt the proposals and recommendations provided above.