

**DOCKETED**

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February 5, 2021

California Energy Commission  
Docket Office, MS-4  
Re: Docket No. 20-RENEW-01  
1516 Ninth Street  
Sacramento, CA 95814-5512  
docket@energy.ca.gov

Re: Southern California Edison Company's Comments on the California Energy Commission  
Docket No. 20-RENEW-01: AB 841 Schools Energy Efficiency Stimulus (SEES)  
Program Draft Guidelines

Dear Commissioners:

On January 22, 2021, the California Energy Commission (CEC) held a workshop on the Schools Energy Efficiency Stimulus (SEES) Program Draft Guidelines. SCE appreciates the thoughtful Guidelines and offers additional insight for consideration as the CEC finalizes the Guidelines.

I. The Program Guidelines should promote decarbonization opportunities where possible.

In SCE's Pathway 2045 whitepaper, SCE outlined the most economical method to meet the state's long term decarbonization goals.<sup>1</sup> Our whitepaper outlined the need to electrify 70% of buildings by 2045. SCE recommends that the Program Guidelines encourage electrification where possible. The School Reopening Ventilation and Energy Efficiency Verification Repair (SRVEVR) Program Guidelines should be modified to explicitly state that fuel switching of Heating, Ventilation, and Air Conditioning (HVAC) equipment is a recommended replacement to make the system more functional and more energy efficient.

Additionally, while not specifically required by Assembly Bill (AB) 841, the CEC should vigorously explore the possibility of including electric heat pump water heaters as part of the School Noncompliant Plumbing Fixture and Appliance (SNPFA) program. More efficient electric heat pump water heaters will provide greater energy efficiency and reduced GHG emissions.

II. The SRVEVR Program Guidelines should include a dedicated retrofit track.

In the draft Guidelines, equipment replacement is considered only after maintenance and repairs are unable to meet the functional requirements. Given that many schools have HVAC equipment that is well past the expected useful life, it would be a more efficient use of funds to have a dedicated retrofit track based on the age of the equipment. If the age of the equipment is

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<sup>1</sup> "Pathway 2045: Update to the Clean Power and Electrification Pathway", SCE, November 2019.  
(<https://www.edison.com/home/our-perspective/pathway-2045.html>)

past the expected useful life, this equipment would not be required to go through the maintenance and repair work, but instead the applicant could apply directly for retrofit funds.

III. The Program Guidelines should allow for multiple sources of funding but limit total funding to the cost of the project.

Both the SRVEVR and SNPFA Program Draft Guidelines provide that a Local Educational Agency (LEA) “may not receive funds to cover the same scope of work from more than one program.”<sup>2</sup> This should be revised to say that “an LEA receiving program funding may not receive funds from another program that, when combined with program funding, exceed the total cost of the project.” The CEC may want to consider adding controls to ensure that this rule is not violated, but SCE believes this change is advisable because it will allow LEAs to layer different incentives in order to maximize potential funding sources, thereby making the funds for the SEES Programs able to reach more LEAs.<sup>3</sup>

IV. Conclusion

SCE thanks the CEC for consideration of the above comments and looks forward to continuing its partnership with stakeholders in the Schools Energy Efficiency Stimulus Program.

Very truly yours,

/s/

Dawn Anaiscourt

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<sup>2</sup> SRVEVR Program Guidelines, p. 13. Can be found at: <https://efiling.energy.ca.gov/getdocument.aspx?tn=236369>

<sup>3</sup> The California Public Utilities Commission (CPUC) issued a staff proposal on incentive layering in the Building Decarbonization Proceeding (R.19-01-011), Phase II Amended Scoping Memo and Ruling of Assigned Commissioner, August 25, 2020, Attachment 2, pp. 7-16.  
(<https://docs.cpuc.ca.gov/PublishedDocs/Efile/G000/M345/K591/345591050.PDF>)