

DOCKETED

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PG&E Comments on AB 841 Draft Guidelines

Additional submitted attachment is included below.



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February 5, 2020

California Energy Commission
Renewable Energy Division (Docket No. 20-RENEW-01)
1516 9th Street
Sacramento, CA 95814

Re: Pacific Gas and Electric Company Comments on staff's current planning for the School Energy Efficiency Stimulus (SEES) Program, authorized by Assembly Bill (AB) 841 (Docket No. 20-RENEW-01)

Pacific Gas and Electric Company (PG&E) appreciates the opportunity to provide feedback on the California Energy Commission (CEC) workshop that discussed staff's current planning for the School Energy Efficiency Stimulus (SEES) Program, authorized by Assembly Bill (AB) 841 (Ting, Chapter 372, Statutes of 2020).

PG&E supports the SEES Program, the funding of critical improvements in California schools, and the two new grant programs--the School Reopening Ventilation and Energy Efficiency Verification and Repair (SRVEVR) Program and the School Noncompliant Plumbing Fixture and Appliance (SNPFA) Program.

PG&E offers the following comments and questions:

- PG&E recommends that the CEC create supporting materials, such as a single-page summary of the program and eligibility criteria, and make them available to potential applicants, stakeholders, and utility customer support representatives.
- What factors will be taken into consideration when deciding the timelines for each funding phase? How will new funding phases be communicated to the public and the investor-owned utilities (IOUs)?
- Can the CEC provide more clarity on what activities are considered assessment and maintenance versus repair and upgrade? Specifically, what activities are ineligible for Phase 1?
- PG&E has an active K-12 heating, ventilation and air conditioning (HVAC) program, implemented by Willdan Energy, that will likely overlap with AB841 activities. PG&E would like to collaborate with the CEC on strategies to manage this overlap and segregate billing so that our customers can take advantage of all energy efficiency (EE) funding sources that are available to them. Possible areas of overlap include:
 - HVAC EE retro commissioning
 - Reset control setting

- HVAC fan motor variable frequency drive (VFD)
 - HVAC zone occupancy controls
 - New energy management system (EMS)
 - Economizer retrofit
- Will the CEC provide examples of the documentation that will be required of program applicants?
 - Since the funds will be awarded on a rolling basis, PG&E believes that it may benefit potential program applicants if the CEC makes public the remaining funds available (in dollar amount from previous solicitations that were not awarded). It also may be beneficial for the CEC to provide updates on these remaining funds on an ongoing basis.

Finally, PG&E, Willdan Energy, and associated HVAC contractors offer to work with the CEC to anticipate the intersections across our local program and this statewide effort and develop strategies to address them.

PG&E appreciates the time and effort that the CEC took to organize the workshop and prepare the draft guidelines to implement the SEES Program, and the opportunity to comment on the development of these important programs. Please do not hesitate to contact me if you have any questions.

Sincerely,

Licha Lopez