

DOCKETED

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The Energy Coalition - AB 841 Comment & Questions

Additional submitted attachment is included below.



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Friday, February 5, 2021

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Project Title: School Energy Efficiency Stimulus Program

Dear CEC Commissioners and Staff:

Thank you for the opportunity to submit comments and questions in regards to the SRVEVR and SNPFA Program Draft Guidelines. We are eager to provide our feedback to these important programs that aim to make schools more energy efficient while preparing them for safe reopening.

The Energy Coalition is an environmental nonprofit organization and the implementer of the Southern California Regional Energy Network (SoCalREN) Public Agency Programs. We help public agencies, including school districts, identify and complete energy efficiency projects so that they can lead their communities towards a safe, reliable, affordable, and clean energy future.

Based on our experience in delivering energy efficiency services to LEAs, we offer the following recommendations that will expedite the application and delivery of program interventions.

First, we recommend that the allowable project costs for the development of the assessments include application submittal and reporting. We are fully aware that the CEC intends to streamline the application and post-installation reporting processes. However, the reality is that many LEAs are stretched extremely thin, especially given the demands of responding to COVID-19 with reduced budgets. Additionally, this assistance will increase the likelihood of approved applications and faster participation in the SEES Program.

Second, we recommend that LEAS have an increased contingency budget in the first round of funding. Our field experience shows that it is common for underserved LEAs to have long-overdue HVAC repair, upgrades and replacements needed. The 20% contingency in the SRVEVR Program may not be sufficient to undertake the projects necessary to make schools more functional and energy-efficient. This may result in the sites that require the most



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assistance to be left behind. Therefore, we would like to see more funds available to the school sites participating in the first round to undertake repair, upgrades and replacements. However, if additional funds beyond the 20% contingency will only be available in future rounds, we would like to ask for clarity on whether the school sites that participate in the first round could later apply for funds in later rounds to pay for additional repair, upgrades and replacements or seek reimbursement for any out-of-pocket costs.

Additionally, we seek clarity on the following:

- Will partial approval of an application be allowed? For example, if an application includes 5 sites and 1 is deemed incomplete or ineligible, will the other 4 sites be funded or will the entire application be rejected?
- What is the expected timeline for payment once the project is complete and reporting is complete?
- If there are changes to the scope and/or cost after a grant has been approved, will there be a process for submitting an amendment?
- The CPUC has established specific baseline requirements for program administrators to use when calculating energy savings that may be claimed towards program and portfolio cost-effectiveness evaluations. These requirements vary by measure application type, alteration type, delivery method, and calculation approach. The SRVEVR program guidelines state that a single base case must be applied to all projects developed through this program when calculating savings. Will the CEC provide additional detail on the calculation methodology required to measure energy efficiency savings?

Thank you for taking the time to review our comments and questions.

Sincerely,

Rebecca Hausheer

Rebecca Hausheer
Director of Energy Services