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**SoCalGas Comments on Revised Staff Draft Guidelines for
SRVEVR**

Additional submitted attachment is included below.



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March 26, 2021

Natalie Lee
Deputy Director, Renewable Energy Division
California Energy Commission
Docket No. 20-RENEW-01
Docket Unit, MS-4
1516 Ninth Street
Sacramento, California 95814-5512

Subject: Comments on Revised Staff Draft Guidelines for School Reopening Ventilation and Energy Efficiency Verification and Repair Program Guidelines

Dear Deputy Director Lee,

Southern California Gas Company (SoCalGas) appreciates the opportunity to comment on the Revised Staff Draft Guidelines for School Reopening Ventilation and Energy Efficiency Verification and Repair Program Guidelines released on March 19, 2021. SoCalGas congratulates the California Energy Commission (CEC) on successfully implementing Proposition 39 - the California Clean Energy Jobs Act Program. This \$1.7 billion Program will achieve an estimated \$100 million savings in school's energy bills and almost 200,000 tons of greenhouse gas emissions (*i.e.*, CO₂e) reductions annually.¹

The School Reopening Ventilation and Energy Efficiency Verification and Repair (SRVEVR) Program, a result of Assembly Bill (AB) 841, will follow the success of Proposition 39 and lessons learned from that initiative. Currently, there is an opportunity to utilize federal dollars to enhance K-12 school ventilation systems. In response to the COVID-19 pandemic, the federal government passed the March 2021 American Rescue Plan (ARP) and the December 2020 Coronavirus Response and Relief Supplemental Appropriations Act (CRRSA). Both stimulus packages provide funding for repairing K-12 school facilities to improve air quality and to reduce the spread of COVID-19. California's allocation is \$15 billion from the ARP and \$6.7 billion from the CRRSA²

Given California's competing policy priorities and limited resources, it is important to leverage

¹ See California Energy Commission, California Clean Energy Jobs Act: Proposition 39 K-12 Snapshot, 2018 July 16. Available at https://www.energy.ca.gov/sites/default/files/2020-05/Prop_39_Snapshot_ada.pdf.

² See Future Ed Webpage on What Congressional COVID Funding Means for K-12 Schools, 2021 March 24. Available at <https://www.future-ed.org/what-congressional-covid-funding-means-for-k-12-schools/>.

federal funding where available. In doing so, more projects could be co-funded with AB 841 monies. In fact, the CEC has had great success in leveraging utility ratepayer dollars to attract federal match dollars. For example, the CEC's Electric Program Investment Charge (EPIC) Program, has successfully leveraged federal match dollars for several years. In following the EPIC model, the SRVEVR Program Guidelines should allow for these federal dollars to be leveraged for our schools and students and not use limited AB 841 dollars for measures that could be funded by federal monies.

SoCalGas appreciates the opportunity to comment on the SRVEVR Program Guidelines. We look forward to seeing the benefits of this Program in our local schools.

Sincerely,

/s/ Tim Carmichael

Tim Carmichael
Agency Relations Manager
Southern California Gas Company