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*Comment Received From: Los Angeles Unified School District
Submitted On: 3/26/2021
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**Los Angeles Unified School District Comments on SRVEVR
Revised Guidelines**

Additional submitted attachment is included below.



LOS ANGELES UNIFIED SCHOOL DISTRICT
Facilities Services Division

March 26, 2021

DOCKET #: 20-RENEW-01

PROJECT TITLE: SCHOOL ENERGY EFFICIENCY STIMULUS (SEES) PROGRAM

Dear CEC Commissioners and Staff,

The Los Angeles Unified School District (Los Angeles Unified) appreciates the efforts by the California Energy Commission (CEC) to establish the School Reopening Ventilation and Energy Efficiency Verification and Repair (SRVEVR) Program and to solicit feedback regarding the program guidelines. We have reviewed the SRVEVR Program Draft Guidelines TN# 237239 and provide the following comments for CEC's consideration.

1. **Eligible and Ineligible Costs.** The District advises that any DSA accessibility requirements, and or other fire, life, safety and abatement costs are direct costs of performing the work. We request consideration of these costs as eligible.
2. **Application Errors and Causes for Non-Approval.** The District requests consideration of how application errors are handled: we request the original date and time of the application's receipt be maintained and not updated to reflect the date and time the corrected or amended application is received. Additionally, the District requests clarification on what would cause non-approval of the application: the current guidelines do not advise.
3. **Funding for Assessment Reports.** The District requests consideration of funding for assessment reports should an application not be approved. Costs must be incurred by an LEA in order to provide the assessment report and estimate required in the grant application. The District requests those costs be reimbursed regardless of whether or not the application receives approval.
4. **Definition of qualified adjusting personnel and qualified testing personnel.** The District thanks the Committee for clarifying the definitions. The District is concerned with the potential costs of TAB certifying in-house labor force, and the limited market of qualified technicians or firms providing this certification which will escalate costs. The District requests consideration of funding for ongoing monitoring and adjustment costs.
5. **Eligible applicants.** The District continues to feel strongly that allowing third parties to complete applications on behalf of LEAs, even though they may not sign or enter into agreements on behalf of the LEA, can lead to confusion, challenges, perceived commitments, and unrealistic expectations. The District recommends that the application submitted by third-party must include a signature from the LEA's authorized agent.

6. **Carbon dioxide monitors.** The program guidelines require that each classroom be equipped with a carbon dioxide monitor that meets specified requirements. We are requesting further clarifications on the continued monitoring of the carbon dioxide levels. We believe that District staff is best positioned not only for monitoring but also adjusting classroom ventilation rates.

7. **GHG Emission Reductions.** The improvements to systems required by this program may result in increased energy consumption. We are seeking clarification on whether or not energy savings and GHG emission reductions be a determining factor for payment upon project completion or whether this data collection is simply for CEC review for future programming purposes?

Thank you for your consideration of our comments and requests. We look forward to the implementation of this program and kindly request a meeting with your staff to assist you as the guidelines are developed.

Sincerely,

Karen Lee, Deputy Director
Facilities Legislation, Grants and Funding