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JCEEP Comments on Revised Staff Draft Guidelines for School Reopening Ventilation and Energy Efficiency Verification and Repair

Additional submitted attachment is included below.

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March 26, 2021

Submitted via Electronic Docket

Docket No. 20-RENEW-01
California Energy Commission
Dockets Office MS-4 1516
Ninth Street Sacramento, CA 95814-5512
School Energy Efficiency Stimulus Program

Re: JCEEP Comments on Revised Staff Draft Guidelines for School
Reopening Ventilation and Energy Efficiency Verification and Repair
Program; TN #: 237221

Dear Commissioners and Staff:

I am writing on behalf of the Joint Committee on Energy and Environmental Policy ("JCEEP") to comment on the Revised Staff Draft Guidelines for the School Reopening Ventilation and Energy Efficiency Verification and Repair Program.

JCEEP is an advocacy organization that represents the California sheet metal workers' local unions and over 25,000 technicians working for over 600 contractors throughout California. JCEEP's mission is to promote responsible environmental and indoor air quality and energy policy in California as it pertains to and impacts the HVAC industry. JCEEP was formed on the premise that air handling systems need to be designed, built and maintained not just to manage comfort levels of indoor air, but also to protect against health threats and to ensure energy efficiency. JCEEP's members have over 15 training facilities throughout the state and thousands of workers being trained daily in HVAC specialties, such as testing, adjusting and balancing, commissioning, green building design, energy efficiency, and indoor air quality.

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JCEEP appreciates the excellent work that staff has put into developing these guidelines in a very short time frame. JCEEP supports the guidelines with just a couple of minor comments.

First, JCEEP would like to see further guidance developed for addressing schools that do not currently have mechanical ventilation, and as a result are unable to meet minimum ventilation and filtration guidelines. JCEEP understands that staff has held off on providing guidance on if, or how, such schools would become eligible for funding under the AB 841 program due to the short timeline they have to commence this program. JCEEP agrees that it is more important to get this program off the ground quickly than to achieve perfection in all areas. However, JCEEP would like to see a commitment by the Commission to hold a joint workshop with the Department of Education as soon as feasible to discuss how to address and provide assistance to schools that do not currently have mechanical ventilation.

Second, JCEEP respectfully request clarification of Chapter 4(B) regarding baseline and calculation of greenhouse gas reductions and energy efficiency savings that may result from this program. Public Utilities Code Section 1618 requires that the baseline for determining reductions in emissions of greenhouse gases and energy savings from this program “shall be the energy demand and emissions of greenhouse gases that would have occurred if ventilation and filtration recommendations for reopening schools were met without the assessment, adjustment, maintenance, repairs, and efficiency upgrades funded pursuant to the program.” This baseline is intended to address systems that are not currently operating at the minimum required ventilation rate. This takes into account that it makes no sense for the baseline to be a system that is not operational or does not provide required levels of ventilation, but rather the baseline should be the current system if it was run in a manner to meet required health and safety standards.

To meet this statutory directive, the Draft Guidelines contain the following language:

The baseline for determining reductions in emissions of greenhouse gases and energy savings from the SRVEVR Program shall be the energy demand and emissions of GHG that would have occurred if ventilation and filtration recommendations for reopening schools were met without the assessment, adjustment, maintenance, repairs, and efficiency upgrades funded under the SEES Program.

This proposal requires additional clarity to recognized that for many non-operational or inadequate systems, the baseline will need to be an estimated baseline – not an actual baseline. That estimate could be provided either by project specific calculations or through more general estimates supported by studies or representative modeling as to the average energy efficiency savings that systems of this type and condition would obtain if they underwent the testing, balancing, adjustment and general maintenance required under this program. In addition, this proposal should clarify that neither the contractor nor the school is responsible for determining or estimating energy and greenhouse gas savings. Energy and greenhouse gas savings are not a required element of the HVAC assessment or verification report. However, the school and the contractor should be required to cooperate with Energy Commission staff or Energy Commission consultants in any assessment of an individual project’s energy and greenhouse gas savings. This should include providing access to the project site and providing project and equipment information.

Proposed Language

The baseline for determining reductions in emissions of greenhouse gases and energy savings from the SRVEVR Program shall be the actual, estimated or calculated energy demand and emissions of GHG that would have occurred if the existing system was operating at required ventilation rates with the required filtration after adjustments, maintenance, repairs, and efficiency upgrades funded under the SEES Program. Energy and greenhouse gas savings are not a required element of the HVAC assessment or verification report. However, the school, contractor, and/or licensed professional shall cooperate with Energy Commission staff or Energy Commission consultants in any assessment of an individual project’s energy and greenhouse gas savings, including providing access to the project site and providing project and equipment information.

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JCEEP commends Commission staff for the excellent job they have done on these guidelines in a very short time frame. This is an important program for the health and safety of students and teachers and JCEEP's members look forward to contributing to its success.

Sincerely,

A handwritten signature in blue ink that reads "Thomas A. Enslow". The signature is written in a cursive style with a long horizontal flourish at the end.

Thomas A. Enslow
Counsel for the Joint Committee
on Energy and Environmental Policy

TAE:ljl