DOCKETED	
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Comment Received From: Jeff Morris

Submitted On: 4/16/2021

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Disqualification of Schools in Public Utility areas is an equity issue

See attached document from Trinity County Superintendent of Schools, Sarah Supahan.

Additional submitted attachment is included below.

April 12, 2021



Commissioner Karen Douglas California Energy Commission 1516 Ninth Street Sacramento, CA 95814

RE: School Energy Efficiency Stimulus (SEES) Program - AB 841 Program Guidelines

Dear Commissioner Douglas,

Thank you for the opportunity to comment on the SEES Program.

Trinity County is a frontier rural county in far Northern California that is host to approximately 1500 students in nine dispersed school districts covering a mountainous and isolated geographic territory equivalent in size to the state of Rhode Island. Most of our communities face multiple level challenges due to significant levels of poverty, with most also lacking modern infrastructure and inadequate levels of broadband internet service. All of our communities are constrained by a limited tax base due to upwards of 80% of the lands within the county being under the jurisdiction of the United States Forest Service, Bureau of Land Management and other federal entities.

Timing and Capacity: As other districts have expressed, we are very concerned about the smaller, under-resourced LEAs who may not have the immediate personnel capacity to effectively conduct a needs assessment and submit an application during this very dynamic time that is demanding a lot of our talent resources.

Funding Restrictions Are Not Equitable: Additionally, while we applaud the efforts of the CPUC, the California Legislature and the CEC in developing this program, we are disappointed that only two of our schools are currently eligible since the vast majority of our communities are within the jurisdiction of a public utility, Trinity Public Utilities District. We believe that this stipulation within the rulemaking presents an unfair playing field for our already underserved school districts. Regardless of the funding source, a program authorized through legislation utilizing funding acquired by a public agency specifically for k-12 public school related infrastructure improvements should be available to ANY k-12 public LEA.

Across other key areas of health and safety, state funding is not restricted due to the private entity that is paying the taxes or funding the work. Once the dollars have entered the system and allocated as available to public k-12 LEAs, they should be available to all districts, especially if those districts are already underserved and disadvantaged.

In our collective work building out our infrastructure and assisting our schools with their facilities issues, the only time geography has come into question is in terms of how much additional capacity our districts need, based on their geography as a disadvantage. To have the tables turned in this case is not only a surprise but also an unwarranted precedent in determining awards within a statewide program through the lens of the private sector sources of funding.

We request that the CEC expand this opportunity to all LEAs across California, within your current funding breakout levels, without a distinction based on the local utility provider service area. We also support the CEC providing additional up front funding to assist LEAs in underserved areas to assess their existing HVAC systems and other needs to ensure that their applications are competitive. This can "even the playing field" for their individual funding applications so that precious limited district funds are not at risk to support an application.

The school district environment varies widely across California and I hope that these comments are helpful to ensure that this program can be both effective and equitable for all concerned.

Many thanks in advance,

Sarah Supahan, Trinity County Superintendent of Schools

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Cc: CEC Chair, David Hochschild

CEC Commissioner, Siva Gunda

CEC Commissioner, J. Andrew McAllister

CEC Commissioner, Patty Monahan

Gretchen Deichler, Assistant Superintendent of Business Service