

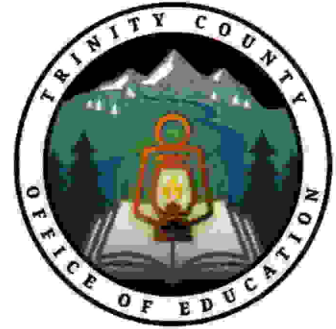
<b>DOCKETED</b>	
<b>Docket Number:</b>	20-RENEW-01
<b>Project Title:</b>	School Energy Efficiency Stimulus Program
<b>TN #:</b>	237471
<b>Document Title:</b>	Trinity County Superintendent of Schools Comments on Disqualification of Schools in Public Utility areas is an equity issue
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	Trinity County Superintendent of Schools/Jeff Morris
<b>Submitter Role:</b>	Public Agency
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*Comment Received From: Jeff Morris*  
*Submitted On: 4/16/2021*  
*Docket Number: 20-RENEW-01*

**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.

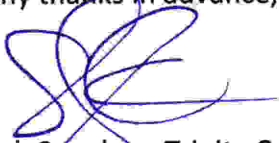
Across other key areas of health and safety, state funding is not restricted due to the private entity that is paying the taxes or funding the work. Once the dollars have entered the system and allocated as available to public k-12 LEAs, they should be available to all districts, especially if those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



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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