

<b>DOCKETED</b>	
<b>Docket Number:</b>	20-RENEW-01
<b>Project Title:</b>	School Energy Efficiency Stimulus Program
<b>TN #:</b>	237757
<b>Document Title:</b>	BESC Comments re Simplify re AB841 and reduce unnecessary costs, challenges in rural areas
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	BESC
<b>Submitter Role:</b>	Public
<b>Submission Date:</b>	5/7/2021 7:17:59 PM
<b>Docketed Date:</b>	5/7/2021

*Comment Received From: BESC  
Submitted On: 5/7/2021  
Docket Number: 20-RENEW-01*

**Simplify AB841 and reduce unnecessary costs, challenges in rural areas**

*Additional submitted attachment is included below.*



**May 7th, 2021**

California Energy Commission  
1516 Ninth Street  
Sacramento, CA, 95814

This letter **formalizes the major comments we made** during your public draft meeting held online during April 28th, 2021:

Main purpose of this letter is to address the needs of smaller schools in rural areas with less complex HVAC systems.

- ) Use less complicated and shorter forms than the “10 NEMI/SMACNA form package” for small package units, PTACs, split systems, and mini-split systems with another type of ventilation/filtration.
- ) Allow only ONE one-page form if HVAC system is 20 years or older, broken, or obsolete that shows a photo of the unit and documents the brand, serial number, and model number (if you can even read these numbers still).
- ) Open up the testing and commissioning to all **qualified** C61/D62, NBC/NCI trained and certified performance testers and air balancers, and California certified commercial HERS raters, especially in rural areas.
- ) Create a FREE unbiased consultation team within California Energy Commission who can help schools qualify testing and balancing credentials, especially **relevant experience** at no charge. CEC has at least one experienced system balancer on staff that we know of, hopefully more.

We have tested the current AB841 process in the field at four (4) schools and find it unnecessarily long for simple systems and puts both school districts and private companies at risk of losing money due to uncertainties of AB841 reimbursement structure and application process..

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