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## **Comments on the February 15 CalSHAPE Program Workshop**

*Additional submitted attachment is included below.*



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February 22, 2022

Commissioner J. Andrew McAllister  
California Energy Commission  
Docket Unit, MS-4  
Docket No. 20-RENEW-01  
715 P Street  
Sacramento, CA 95814-5512

**Subject: Comments on the February 15 California Schools Healthy Air, Plumbing, and Efficiency (CalSHAPE) Program Workshop**

Dear Commissioner McAllister:

Southern California Gas Company (SoCalGas) appreciates the opportunity to provide comments on the February 15, 2022, California Energy Commission (CEC) California Schools Healthy Air, Plumbing, and Efficiency Program (CalSHAPE) Workshop to gather stakeholder feedback on status updates for the ventilation and plumbing programs. We are very supportive of the benefits that the CalSHAPE Program provides to underserved public schools and recognize that many classrooms do not meet the State’s ventilation standards.<sup>1</sup> We believe the CalSHAPE program is a step in the right direction as most California school districts “underspend on their facilities each year.”<sup>2,3</sup>

Reducing emissions from buildings is critical to California achieving its climate and sustainability goals. SoCalGas is and has been a national leader in delivering energy efficiency programs that reduce emissions through decreased natural gas, electric, and water use in residential, commercial, and industrial buildings. SoCalGas currently administers a \$114 million annual energy efficiency portfolio of 90 programs, constituting the largest natural gas energy efficiency portfolio in the

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<sup>1</sup> See Ventilation rates in California classrooms: Why many recent HVAC retrofits are not delivering sufficient ventilation, Chan et. al, available at: <https://www.sciencedirect.com/science/article/abs/pii/S0360132319306365>

<sup>2</sup> See School reopening & ventilation: which California schools will get priority for ab 841 funds to upgrade their building ventilation systems? Center for Cities + Schools, University of California Berkeley, available at: <https://citiesandschools.berkeley.edu/blog/school-reopening-ventilation-which-california-schools-will-get-priority-for-ab-841-funds-to-upgrade-their-building-ventilation-systems>

<sup>3</sup> The Center for Cities + Schools of UC Berkeley also found that “[m]ore than three-quarters of California’s students attend school in districts failing to meet minimum industry standard benchmarks for annual facilities maintenance and operations investment, capital renewal investment, or both. These school districts accumulate deferred maintenance across their school building inventory – minor items of disrepair that, when left unfixed, grow into larger more expensive problems and risk becoming health and safety crises.”

country. We also administer electric and water efficiency programs on behalf of three investor-owned electric utilities, five municipal-owned utilities, and 16 water agencies in Southern California. SoCalGas demonstrated the success of its programs by saving customers more than 46.5 million net therms in 2020, which represents 137% of the energy efficiency goal established by the California Public Utilities Commission (CPUC) in D.17-09-025.<sup>4</sup> Further, SoCalGas cost-effectively administered energy efficiency (EE) savings to customers, providing ratepayers over \$314 million in resource benefits in the same year.<sup>5</sup> The success of SoCalGas' energy efficiency programs is reflected on Slide 44 of the CEC Workshop Presentation,<sup>6</sup> which illustrates that there was only \$1.5 million in energy efficiency funds left over from our 2020 program cycle. The requests for funding of \$11 million in CalSHAPE funds far exceed the monies available via the program.

During the workshop, CEC Staff proposed three possible approaches to exhausted funding within the program: 1) no change; 2) restrict application submittal in exhausted funding categories; and 3) application queuing. SoCalGas respectfully proposes a fourth approach as a productive pathway for applicants who apply to exhausted funds. We would like to work with those applicants to provide energy efficiency benefits through our other existing programs, such as the Public Direct Install Program (PDIP), which provides no-cost energy efficiency upgrades for K-12 school facilities. SoCalGas can work with applicants of the CalSHAPE Program to build out solutions for the needed energy efficiency upgrades for eligible schools within our service territory.

## **Conclusion**

In closing, we commend the CEC's continued determination to advance equity in public schools across the State. We look forward to continuing to work with CEC Staff in efforts to develop a program benefiting all of California's public schools.

Respectfully,

*/s/ Kevin Barker*

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<sup>4</sup> See Southern California Gas Company (U 904 G) Energy Efficiency Programs 2020 Annual Report, Filed May 3, 2021, Rulemaking 13-11-005, available at:

[https://www.socalgas.com/sites/default/files/SCG\\_2020\\_Energy\\_Efficiency\\_Annual\\_Report.pdf](https://www.socalgas.com/sites/default/files/SCG_2020_Energy_Efficiency_Annual_Report.pdf)

<sup>5</sup> *Ibid*

<sup>6</sup> See Workshop Presentation, California Schools Healthy Air, Plumbing, and Efficiency Program Workshop, CEC, available at: <https://www.energy.ca.gov/event/workshop/2022-02/california-schools-healthy-air-plumbing-and-efficiency-program-workshop>