

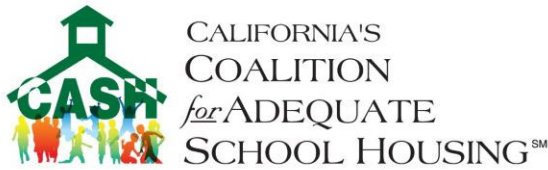
**DOCKETED**

<b>Docket Number:</b>	20-RENEW-01
<b>Project Title:</b>	California Schools Healthy Air, Plumbing, and Efficiency
<b>TN #:</b>	248531
<b>Document Title:</b>	CASH Comments - CalSHAPE Ventilation Program HVAC Upgrade and Repair Grants
<b>Description:</b>	N/A
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*Comment Received From: CASH  
Submitted On: 1/25/2023  
Docket Number: 20-RENEW-01*

**CaISHAPE Ventilation Program HVAC Upgrade and Repair Grants**

*Additional submitted attachment is included below.*



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January 25, 2023

Jonathan Fong  
California Energy Commission  
715 P Street  
Sacramento, CA 95814

Dear Mr. Fong,

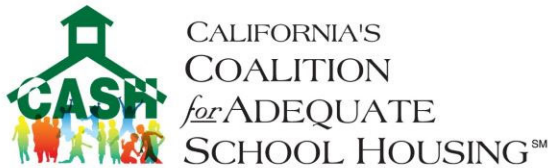
Thank you for the opportunity to comment on the CalSHAPE Ventilation Program HVAC Upgrade and Repair Grants. Healthy Indoor Air Quality (IAQ) has always been a key issue for K-12 schools. The COVID-19 pandemic highlighted the critical role healthy IAQ at schools plays for students and school staff, as well as its positive contribution to student academic performance. The Coalition for Adequate School Housing (CASH), the Coalition for Adequate School Housing Maintenance Network (CMN) and the School Energy Coalition (SEC), worked with the California Energy Commission (CEC), the sponsor of AB 841, and other key stakeholders, as the bill was developed into the CalSHAPE program to ensure that the program worked for K-12 school facility and maintenance departments, who are the end users.

The CalSHAPE program has been an important funding resource for California schools who qualify to assess the needs of their HVAC systems and make needed upgrades. We appreciate the opportunity to provide input on how the program can be improved to better serve schools and be sustainable long-term. In the near term, we support a fourth funding round to make unused program funds available for more school HVAC assessments and repairs. In the long-term we support changes that make the program open to all schools who have need and qualify, including access to a long-term source of funding when existing funds are exhausted.

Since the implementation of AB 841, CASH, CMN and SEC have advocated for sustainable funding and program changes to allow all schools to be eligible for CalSHAPE funds if they have a qualifying project, and to allow funds to be used to upgrade and replace issues identified on the Assessment Report. While we recognize the service area limits are associated with the funds dedicated to CalSHAPE, when new funding is considered, we urge you to consider a broader program that allows all schools to apply for funds. We also believe that underserved rural schools without access to a skilled and trained workforce should be granted a waiver if they demonstrate the lack of availability. The following is CASH, CMN and SEC's response to CEC's specific questions about how to improve the program:

#### Eligibility

- Eligibility for grant awards will be limited to schools in underserved communities in the first funding round.
    - *Comment: While we agree with this policy goal, it limits who can access funding.*
  - The number of applications and the number of sites that can be included in each application may be limited in each funding round.
    - *Comment: No comment at this time.*
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## CalSHAPE Ventilation Program HVAC Upgrade and Repair Grants

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### Scope

- Local Education Agencies (LEA) will not be required to correct all the deficiencies noted in the HVAC Assessment Report. LEAs can prioritize deficiencies and select which HVAC systems at a site to repair, upgrade, or replace.
  - *Comment: We support this proposal because it allows local flexibility for schools to prioritize need: repair, upgrade or replacement.*
- No grant funds for purchase and installation of gas HVAC equipment and preference for heat-pump technology.
  - *Comment: While we recognize the advantage of going to electric HVAC equipment from a sustainability and efficiency standpoint, replacing or upgrading to electric HVAC equipment will add cost to projects and increased need for additional staff training. Examples of significant added costs are Division of the State Architect structural implications with heavier units, electrical service upgrades and upgrades to energy management systems.*
- HVAC Upgrade and Repair Grant must be completed within a 2-year project term.
  - *Comment: There is currently a 52-week lead time on HVAC units. We believe flexibility to go beyond two years should be an option.*

### Project Costs

- Other than direct HVAC system repair and replacement, what should be an eligible cost under the HVAC Upgrade and Repair Grant?
  - *Comment: Energy management systems*
- Is there a need for soft costs to be eligible, and if so, which soft cost specifically?
  - *Comment: Soft costs are needed for Architectural, Mechanical, Structural AND Quality Assurance and Quality Control. These are critical to disadvantaged schools that have less access to resources and budget flexibility. Commissioning to soft costs accounts for these cost impacts.*

### Award Limits

- What is the best metric for setting a maximum grant award to provide a reasonable amount of funds for the large variety of HVAC systems and classrooms?
  - *Comment: Points matrix, bonus points for free and reduced, useful life of 20-25 years, gas to electric, small medium large tonnage units, energy managed vs stand alone.*



CALIFORNIA'S  
COALITION  
*for* ADEQUATE  
SCHOOL HOUSING<sup>SM</sup>



CALIFORNIA'S  
COALITION  
*for* ADEQUATE  
SCHOOL HOUSING<sup>SM</sup>  
**Maintenance Network**



**SCHOOL ENERGY COALITION**  
*ADVANCING ENERGY AND WATER SOLUTIONS FOR SCHOOLS*

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- *Without knowing the variables from unit to unit this would be hard to cost out. Unless an estimator used a size/tonnage calculator and came up with a generic small medium-large range.*
  
- What are reasonable amounts for a replacement of HVAC equipment components only?
  - *Comment: Varies heavily from unit to unit, size, coil replacement, compressor replacement, shaft replacement, bearings, economizers, field controllers, economizers actuators etc.*
  
- Replacement of electrical components including converting from gas furnace to electric heat pump.
  - *Comment: Varies heavily from unit to unit, size, coil replacement, compressor replacement, shaft replacement, bearings, economizers, field controllers, economizers actuators, etc.*
  
- Award amount for softs?
  - *Comment: 15%-20% - This is tied to design engineers*
  
- Not to exceed maximum award?
  - *Comment: No comment at this time.*

Thank you for the opportunity to provide public comment on potential improvements to the CalSHAPE program. CASH, CMN and SEC look forward to working with you to improve the program.

Sincerely,



Ian Padilla

IP/ad