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Docket #: 20-RENEW-01

Project Title: School Energy Efficiency Stimulus Program

Dear Commissioners and Energy Commission Staff:

The Coalition for Adequate School Housing (CASH) and the CASH Maintenance Network (CMN) strongly supported AB 841 (Ting) in the Legislature and were pleased when the Governor signed it into law because we believe that healthy air, water and energy efficiency and resiliency are critical components of a healthy learning environment and reopening schools. The SRVEVR and SNPFA programs can help K-12 schools achieve these critical objectives. CASH and the CMN would like to work with you to ensure that schools can access this program in a timely manner to conduct assessments, replace filters, make repairs, install CO² monitors, and access funding for larger system replacements if it is available in later funding rounds. We appreciate the opportunity to outline our priorities, express our concerns, and offer our expertise in K-12 school facilities and maintenance as the programs are developed.

In addition, although the focus of this letter is SRVEVR program due to time constraints, CASH believes the SNPFA program is important and allows K-12 schools to ensure clean drinking water by providing funding to upgrade out of code plumbing fixtures. CASH has been a leader in water use policy in educational environments, and was involved in AB 746 and subsequent legislative and state agency efforts to improve water quality for K-12 schools. We offer our expertise in school water policy as the Guidelines are developed.

General K-12 School Concerns

Following the intent of the bill, CASH believes there is wide agreement among stakeholders and the public to get projects going as soon as possible – creating a program that provides incentives and resources, rather than rigid mandates, will help provide this flexibility. In addition, we believe it is critical to make the rules of reimbursements very clear as soon as possible. AB 841 states that qualifying projects can be reimbursed back to August 1, 2020, and schools are ready to assess, repair and upgrade their HVAC systems as necessary, but uncertainty about the details of qualifying projects and reimbursements causes schools to hesitate to initiate projects.

More broadly, K-12 schools concerned about ending up in a situation where they have assessed and identified the deficiencies with their current HVAC infrastructure, but do not have access to sufficient funds to make the necessary upgrades. In addition, schools are concerned about applying new state standards to very old, inadequate and

often nonexistent HVAC infrastructure. Finally, schools are concerned about the potential for a complicated application process and unanticipated costs. In plain terms, if the final program presents schools with too many liabilities and not enough resources, many will hesitate to participate.

Specific Concerns and Recommendations

The following are concerns and recommendations from our school district members. While it is not an exhaustive list, it is the most current information from school districts:

- CO² Monitors - CO² monitors in all classrooms is a new requirement for K-12 schools and will be a challenge. Paying for and installing monitors is one challenge; knowing how to manage the data is another. *Our school facility and M&O experts can assist you with the technical aspects of this provision which will be critical.*
- Replacement of old systems will improve Indoor Air Quality (IAQ) but will likely use more energy - this needs to be taken into account as the program is developed.
- Allow funding to be used to hire consultants.
- Clarify that procurement for services can be done by competitive selection.
- Clarify that districts who receive service from one or more of the service providers are eligible for participation even if they receive some services from municipal utilities.
- Estimate the total cost for assessment if all eligible school districts apply.
- Clarify how program will work for portable classrooms on land that is leased or otherwise not owned by the districts.

Technical Assistance

K-12 schools are the users for this program and we can assist the CEC on technical matters related to these and other school-specific issues. In addition, attached for your reference is a letter from Rex Wang (LEAF Engineering) that provides more detailed technical comments including a mark-up for your reference.

- K-12 school bidding and RFP process, contractor estimates, etc. – Don't reinvent the wheel.
- Access to K-12 school facility and maintenance experts who have installed and are currently monitoring CO² levels in all classrooms in advance of the requirement.
- Is the phased approach for project eligibility a barrier to retrofit projects?
- Could the application tiers discourage large LEAs from including all schools?

- What is the estimated cost for the HVAC assessment and maintenance required by the SRVERV program?
- What are methods for verifying contractor estimates?
- Cost vs Benefit analysis of different CO² monitoring systems.
- CAN SRVERV projects be started/completed in the next 12-18 months?
- How much time will an LEA need to develop an application based on the information needed (contractor estimates, all sites in one application?)

Thank you for the opportunity to comment on the SRVEVR and SNPFA programs. We propose a Zoom meeting with your staff to assist you as the Guidelines are developed.

Sincerely,



Ian Padilla
CASH Legislative Advocate

cc: David Hochschild, Chair, California Energy Commission
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