

CPUC Staff Ex Ante Review

CPUC Staff Project ID Number	PGE 20 C R 449 PRI - 02265671 HVAC
CMPA Directory Link	PWA
PA	PGE
PA Application ID	PRI - 02265671
PA Application Executed Date	NA
PA Program ID	a0n360000NcVIR
PA Program Name	Residential New Construction - Residential New Construction - Deemed SF
PA Program Year	2020
Date of CPUC Staff Review:	6/2/2020
PA CMPA Upload Dates Included in this review:	
First PA Upload	4/3/2020
Second PA Upload	4/14/2020
Third PA Upload	#N/A
PA Measure Description(s):	
Measure 1	INTEGRATED BUILDING-RES-SINGLE FAMILY - WHOLE HOUSE 15-20%
Measure 2	
Measure 3	
Measure 4	
Measure 5	
Measure 6	
Measure 7	
Measure 8	
Measure 9	
Measure 10	
PA Project Description:	NA
PA Ex Ante kW Demand Reduction	0.9
PA Ex Ante Annual kWh Impacts	44.2
PA Ex Ante Annual Therm Impacts	145.7
PA Proposed Incentive \$ (to Customer)	\$801.00
PA Proposed Total Payment to Implementer \$ (not to include the above incentive to customer)	0
CPUC Staff Approved Ex Ante kW Demand Reduction	0.9
CPUC Staff Approved Ex Ante Annual kWh Impacts	44.2
CPUC Staff Approved Ex Ante Annual Therm Impacts	145.7
CPUC Staff Primary Reviewer Name	
CPUC Staff Primary Reviewer Firm	SBW Consulting
CPUC Staff Review Supervisor Name	
CPUC Staff Review Supervisor Firm	BMI
PA Primary Reviewer Name	
PA Primary Reviewer Firm	
CPUC Staff Project Manager	
CPUC Staff Policy Authorization (as needed)	
CPUC Staff Recommendation Marked "X":	
	Application ready to proceed without exception
	Application ready to proceed with exception(s), as noted
	Application rejected.
x	Prospective review

Action Number:	Summary of CPUC Staff Required Action by the PA:	Action Category	Due Date	TBC Response	Response Date	CPUC response	Response Date
1	According to HERS rater testing documents, this project was tested after completion in 2017. CPUC rules require that project savings must be claimed in the year the project is completed, unless ex-post M&V is required. We understand that there were issues with the HERS Registry, but it is not clear why it took 3 years to claim this project. The issues in the notes section below were not grounds for project rejection, but were noted during the review.	CPUC Policy	N/A			CAHP timing issues will be addressed prospectively.	8/11/2020

Note or Instruction Number:	CPUC Staff Notes or Instructions:	Instruction Category	Due Date	PA Response	Response Date	CPUC response	Response Date
1	Measure description is "INTEGRATED BUILDING-RES-SINGLE FAMILY - WHOLE HOUSE 15-20%," but project savings is less than 15% (10.9% relative to Title 24).	Other - measure name inconsistent with project	N/A	Per program policy, improvement of less than 15% is allowed. For the 2013 code program, a CAHP score was the metric used to determine eligibility. While compliance, i.e. percent above code, only looks at the regulated loads, CAHP score encompasses all end uses - both regulated and non-regulated loads. Compliance and CAHP score do not always go hand-in-hand, and often show variance due to the underlying calculation methodology. Please see the following attached documents: -2016 Program Handbook Online Link: https://cahp-pge.com/wp-content/uploads/2016/07/2016-CAHP-Handbook.pdf - Communication stating that measure code CIB14 will be used for projects indicating 0-20% compliance above code.	6/16/2020	Agree compliance margins of <15% are allowable. Please assign the Measure Description according to the project expected savings margin.	8/11/2020
2	Incremental measure costs for project not provided	Measure cost	N/A	Under the performance-based approach for these whole-building efficiency programs such as CAHP, builders and developers are free to choose from any combination of above code measures and trade-offs to achieve a higher delta EDR and comply with program requirements. This makes it difficult to associate specific incremental costs with each project. For cost effectiveness calculations, the incremental measure costs (IMC) for new construction projects is assumed to be twice of the incentive amount awarded to the project.	6/17/2020	Thank you for the clarification. Please provide documentation supporting the IMC = 2x incentive assumption	8/11/2020
3	Project EUL not provided. If DEER EUL is used, please provide the EUL-ID.	EUL/RUL	N/A	EUL used for CAHP is 18 years. Please see details on the DEER EUL used below: EUL ID - WhiBldg-WBInsFen-NEW-SF EUL ID Description: Whole Building new construction single family building shell improvements	6/18/2020	Thank you for the clarification. No further response expected	8/11/2020
4	Compliance margin in incentive calculator is 10.9%, while compliance margin in commitment documentation is 11.8%.	Other - inconsistencies in documentation	N/A	Please see the revised Incentive Calculator	6/19/2020	Thank you for the update. No further response expected	8/11/2020
5	Site selected uses Plan -1. CF1-R forms submitted are for Plan-3.	Missing documents	N/A	See attached CF-1R for Plan 1.	6/20/2020	Thank you for the update. No further response expected	8/11/2020
6							
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CPUC Staff Recommendation Definitions	
CPUC Staff Recommendation	Definition
Application ready to proceed without exception	<p>The PA will continue to upload application documents to the CMPA directory through the implementation and claims phases of the project. The PA may proceed to approve the project without waiting for CPUC Staff response. A project is waived from further review at the post-installation stage by CPUC staff, but the PA is responsible for post-installation (IR) review. There will not be conditional approval.</p>
Application ready to proceed with exception(s), as noted	<p>The PA must make revisions or changes as noted in CPUC Staff's review comments. The PA will continue to upload application documents to the CMPA directory through the implementation and claims phases of the project. The PA may proceed to approve the project without waiting for CPUC Staff response. If CPUC Staff decides to perform IR review of a project, CPUC Staff will notify the PA. The scope will be limited to determine if the project was carried out consistent with the application and notes provided during pre-installation review and to obtain information pertaining to whether the eligibility criteria or metrics should be revised.</p> <p>Unless the scope of work presented in project application has changed at IR review, the project will not be reviewed again in the areas specified below. Scope change is defined by substantial changes include significant modifications to the proposed equipment type, size, quantity, configuration, the expansion of a project to include additional retrofits, or the splitting of a project into multiple phases.</p> <p>The following areas will not be reviewed again by CPUC Staff:</p> <ul style="list-style-type: none"> • Calculation Tool • Calculation Methodology • M&V Plan • Baseline • Eligibility • EUL/RUL • Measure Type • Program Influence
Application rejected.	<p>The application is rejected as submitted. The PA shall promptly inform the applicant as to the reasons why the project was rejected and the specific recommendations for the conditions under which the project would be approved. CPUC Staff shall provide the reasons for the rejection or request for modification, including each basis as to why the project is rejected, or modification is requested. In addition, CPUC Staff shall provide specific recommendations for the conditions under which the project would be approved.</p> <p>If any party to the project is unsatisfied with the Commission's directions for the project, a dispute resolution process may be initiated by that party. The Commission shall adopt rules for the conduct of the dispute resolution process. – Section 381.2 (g) (3) (F)</p>
Application not ready for review, revised and resubmit as noted	<p>The application has deficiency in the supporting documentation and the PA has provided incomplete documentation. The complete documentation has been defined in the Statewide Custom Projects Guidance Document. Please note that this is not a final recommendation from CPUC staff. This recommendation is limited to two requests per application.</p>