

**CPUC Staff Ex Ante Review**

CPUC Staff Project ID Number	PGE_21_C_C_642_Site Specific Comprehensive - 23847_NMEC
CPMPA Directory Link	<a href="https://deeresources.info/cmpa/projects/19069">https://deeresources.info/cmpa/projects/19069</a>
PA	PGE
PA Application ID	Site Specific Comprehensive - 23847
PA Application Executed Date	12/31/2020
PA Program ID	COWBDPGE19
PA Program Name	Commercial Calculated Incentives Commercial Whole Building
PA Program Year	2020
Date of CPUC Staff Review:	7/6/2021
PA CMPA Upload Dates Included in this review:	
First PA Upload	4/23/2021
Second PA Upload	5/19/2021
Third PA Upload	#N/A
Fourth PA Upload	
Fifth PA Upload	
Sixth PA Upload	
Seventh PA Upload	
Eighth PA Upload	
PA Measure Description(s):	
Measure 1	NMEC Whole Building
Measure 2	
Measure 3	
Measure 4	
Measure 5	
Measure 6	
Measure 7	
Measure 8	
Measure 9	
Measure 10	
PA Project Description:	0
Bi-Monthly Upload kW Demand Reduction	31.7
Bi-Monthly Upload Annual kWh Impacts	180,701.0
Bi-Monthly Upload Therm Impacts	3,816.0
PA Proposed Incentive \$ (to Customer)	\$12,784.50
Project Documentation kW Demand Reduction	31.7
Project Documentation Annual kWh Impacts	180,701.0
Project Documentation Annual Therm Impacts	3,816.0
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:	Advisory
For rejection, action required:	N/A
M&V Review:	Post M&V Review (M&V Results and Final Calculations) Required

Action Number:	Summary of CPUC Staff Required Action by the PA:	Action Category	PA Response	ED Resolution
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1	<p>Through analysis of residuals from an independent ECAM analysis, the reviewer found a significant NRE from January 1 through early March, when energy usage was higher during the pre-pandemic timeframe of the baseline period. Moreover, the trend of the residuals drops significantly from the beginning of the baseline year to the end, indicating a significant drop in energy use over the year. By contrast, if the pre-pandemic timeframe is omitted from the model, the trend of the residuals is flat from early March through the end of the year, indicating no significant upward or downward change in energy use. If the pre-pandemic timeframe is included in the the baseline model, baseline energy use will be overstated.. To account for this NRE, we recommend that the baseline model be updated to exclude the pre-pandemic timeframe, either by shifting the whole baseline year forward a few months, or by simply excluding the pre-pandemic data intervals from the baseline model. Both of these approaches (shifting and omitting) would be consistent with the M&amp;V Plan which states: "The baseline period will be updated to the 12-month period immediately preceding the date of the first measure installation, unless otherwise recommended due to particular project circumstances. In particular we will monitor the impact of the COVID-19 pandemic upon building operations. Depending upon the timing of these potential events it may be preferable to adjust the baseline period to exclude these periods of irregular operating conditions." The second approach (omitting pre-pandemic data) would be consistent with IPMVP Application Guide on Non-Routine Events &amp; Non-Routine Adjustments Method #1 (Omit Data) and the NMEC Rulebook v. 2. which allows up to 25% of the data intervals to be omitted from the baseline model for this purpose. Please confirm that you intend to update the baseline model to omit the pre-COVID timeframe using one of the two aforementioned approaches.</p>	Analysis assumptions		
2	<p>Please provide an M&amp;V plan for Option A (bottoms up) gas calculations compliant with SW Custom Projects Guidance document section 3.6. Document sources of variables used in the bottoms up calculations including the gas savings derate factor.</p>	M&V plan		
3	<p>Hourly demand model should be based on 15 hrs from 4pm to 9pm over the three hottest workdays per Resolution E-4952.</p>	Analysis assumptions		

Note or Instruction Number:	CPUC Staff Notes or Instructions:	Instruction Category	PA Response	ED Resolution
1	Please submit the first year performance report for review at the end of the first year performance period.	Continue Document Upload		

CPUC Staff Recommendation Definitions	
CPUC Staff Recommendation	Definition
Application ready to proceed without exception	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.
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 before signed agreement with customer. 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"> <li>• Calculation Tool</li> <li>• Calculation Methodology</li> <li>• M&amp;V Plan</li> <li>• Baseline</li> <li>• Eligibility</li> <li>• EUL/RUL</li> <li>• Measure Type</li> <li>• Program Influence</li> </ul>
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>