

## CPUC Staff Ex Ante Review

CPUC Staff Project ID Number	PGE_21_C_C_680_Site Specific Comprehensive - 35240_NMEC
CMPA Directory Link	<a href="https://deeresources.info/cmpa/projects/19154">https://deeresources.info/cmpa/projects/19154</a>
PA	PGE
PA Application ID	Site Specific Comprehensive - 35240
PA Application Executed Date	
PA Program ID	COWBDPGE19
PA Program Name	Commercial Calculated Incentives ? Whole Building
PA Program Year	2021
Date of CPUC Staff Review:	2/3/2022
PA CMPA Upload Dates Included in this review:	
First PA Upload	8/3/2021
Second PA Upload	10/19/2021
Third PA Upload	1/14/2022
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	0.0
Bi-Monthly Upload Annual kWh Impacts	9,816.0
Bi-Monthly Upload Therm Impacts	0.0
PA Proposed Incentive \$ (to Customer)	\$100,000.00
Project Documentation kW Demand Reduction	0.0
Project Documentation Annual kWh Impacts	31,835.0
Project Documentation Annual Therm Impacts	0.0
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 NOT Required

Action Number:	Summary of CPUC Staff Required Action by the PA:	Action Category	PA Response	ED Resolution
1	Project documentation (Phase 1 Buildings PV-Battery Sites List.xlsx) indicates building has a PV system. Please conduct a non-IOU fuel analysis for this project and include the PV system output in the regression models.	Self generation		

2	Note savings normalized to post COVID rather than pre COVID conditions, since customer determined that lower occupancy due to work from home policy is the "new normal." Post COVID savings >> pre COVID savings since the adjusting HVAC system operating hours measure is more effective when occupancy is low. Measure life is 3 years. Provide evidence that the work from home policy will likely stay in place through the EUL of the measures.	Analysis assumptions		
3	Fractional savings uncertainty (FSU) calculations reference ASHRAE Guideline 14, but live calculations not provided. Our attempt to replicate the FSU of the normalized performance period model yielded very different results. Please provide documentation of FSU calculations in future project submittals.	Missing required information		
4	Our attempt to replicate the baseline period normalized consumption using ECAM showed very different results. Project goodness of fit statistics are close: MBE - 0.000, CV(RMSE) 0.181, R^2 0.79; ECAM: MBE - 0.000, CV(RMSE) 0.193, R^2 0.76. Project normalized consumption 324,381 kWh +/- 7088; ECAM normalized consumption 294,528 kWh +/- 7010. While the performance period normalized consumption is very close, the overall project savings dropped from 31,835 kWh to 2,328 kWh. With the greatly reduced savings, our calculation of FSU is +/- 373% at 90% confidence; >> than the +/- 50% program acceptance criterion. Suggest checking the baseline model and updating savings and project eligibility as necessary before filing claim.	Calculation method		
5	Program Influence (PI) documentation does not meet the requirements in the Custom Projects Guidance Document v. 1.4 Appendix D or CPUC Resolution E-5115. Note this project may be selected for ex-post evaluation of program influence. A full PI documentation package will assist in determining the ex-post NTGR. Please also address program influence questions submitted as an informal data request and reply to CMPA.	Program influence		
6	Incentive listed on bimonthly upload was \$100,000, while estimated incentive in the project documentation package was only \$4,804. Please review expected savings and incentive amounts before submitting projects as ready to review on the bimonthly upload.	Other - discrepancy between bi-monthly upload and project documentation		

Note or Instruction Number:	CPUC Staff Notes or Instructions:	Instruction Category	PA Response	ED Resolution
#REF!				

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. 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>