

CPUC Staff Ex Ante Review

CPUC Staff Project ID Number	PGE_21_T_C_616_PRJ - 02760170_Lighting
CMPA Directory Link	https://deeresources.info/cmpa/projects/18973
PA	PGE
PA Application ID	PRJ - 02760170
PA Application Executed Date	
PA Program ID	PGE210143
PA Program Name	Hospitality Program - Custom Direct Install
PA Program Year	
Date of CPUC Staff Review:	3/25/2021
PA CMPA Upload Dates Included in this review:	
First PA Upload	1/26/2021
Second PA Upload	2/16/2021
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	LIGHTING RETROFIT/NEW-INT LED HIGHBAY
Measure 2	LIGHTING RETROFIT/NEW-INT-LED-GENERAL/AREA LIGHTING
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	65.8
Bi-Monthly Upload Annual kWh Impacts	460,725.8
Bi-Monthly Upload Therm Impacts	0.0
PA Proposed Incentive \$ (to Customer)	\$50,580.64
Project Documentation kW Demand Reduction	65.8
Project Documentation Annual kWh Impacts	583,700.0
Project Documentation Annual Therm Impacts	0.0
CPUC Staff Primary Reviewer Name	
CPUC Staff Primary Reviewer Firm	E350
CPUC Staff Review Supervisor Name	
CPUC Staff Review Supervisor Firm	SBW
PA Primary Reviewer Name	
PA Primary Reviewer Firm	
CPUC Staff Project Manager	
CPUC Staff Policy Authorization (as needed)	
CPUC Staff Recommendation:	Application ready to proceed with exception(s), as noted
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	In response to one of our SDRs, the PA updated lighting hours of use (HOU) per DEER 2020 indoor lighting HOU table. This resulted in higher savings compared to savings reported in the bi-monthly submission. Please update quarterly submission to use corrected savings values. Additionally, note that this is a recurring issue for MLC projects and the PA has been notified about this issue via past dispositions and Early Opinion reviews.	Did not follow previous CPUC guidance		
2	The project used MLC v12.3.1 to estimate savings. This version of MLC uses an incorrect baseline for measure codes CLA42 (Lighting Retrofit/New-Interior-LED-General/Area Lighting). According to the current LED ambient and retrofit workpaper (SWLG012), the base case wattages are determined by division of kilolumen by the efficacy minimum requirement (that is, 100 LPW for LED new luminaires and retrofit kits, and 85.2 LPW for TLED including ballast efficiency and fixture losses). Applying a mix of 67% LED new luminaire or full retrofit kit and 33% TLED results in an overall 95 LPW. MLC v12.3.1 uses 100 LPW for the base case. Please update the savings to use correct baseline values. Additionally, note that this is a recurring issue for MLC projects and the PA has been notified about this issue via past dispositions and Early Opinion reviews.	Did not follow previous CPUC guidance		

3	<p>The project used MLC v12.3.1 to estimate savings. This version of MLC uses an incorrect baseline for measure codes CLA22 (Lighting Retrofit/New-Interior LED Highbay). The values in the MLC lookup table should be updated to match the values in the current Highbay workpaper (SWLG011-03) or Resolution E-5009 that has updated ratios for linear measures. MLC Baseline wattage ranges are different. Please update the savings to use correct baseline values.</p> <p>Additionally, note that this is a recurring issue for MLC projects and the PA has been notified about this issue via past dispositions and Early Opinion reviews.</p>	Did not follow previous CPUC guidance		
4	<p>RUL of existing equipment is estimated based on 1/3 of the EUL of the installed equipment (LEDs) instead of existing equipment. This is a recurring issue for MLC projects and the PA has been notified about this issue through past dispositions and responses to EO requests.</p>	Did not follow previous CPUC guidance		

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

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"> • 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>