

CPUC Staff Ex Ante Review

CPUC Staff Project ID Number	PGE 21 C 737 PRJ-03621888_HOPP
CMPA Directory Link	https://deeresources.info/cmpa/projects/19758
PA	PGE
PA Application ID	PRJ-03621888
PA Application Executed Date	
PA Program ID	PGE210911
PA Program Name	On-Bill Financing Alternative Pathway
PA Program Year	
Date of CPUC Staff Review:	5/5/2022
PA CMPA Upload Dates Included in this review:	
First PA Upload	3/15/2022
Second PA Upload	4/18/2022
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 RETROFITNEW-EXT-LED-POLE MOUNTED
Measure 2	
Measure 3	
Measure 4	
Measure 5	
Measure 6	
Measure 7	
Measure 8	
Measure 9	
Measure 10	
PA Project Description:	LED Streetlight Retrofit
Bi-Monthly Upload kW Demand Reduction	0.0
Bi-Monthly Upload Annual kWh Impacts	2,165,099.0
Bi-Monthly Upload Therm Impacts	0.0
PA Proposed Incentive \$ (to Customer)	\$0.00
Project Documentation kW Demand Reduction	0.0
Project Documentation Annual kWh Impacts	2,591,117.9
Project Documentation Annual Therm Impacts	0.0
Project Documentation Incentive \$ (to Customer)	0.0
CPUC Staff Primary Reviewer Name	
CPUC Staff Primary Reviewer Firm	Quantum
CPUC Staff Review Supervisor Name	
CPUC Staff Review Supervisor Firm	Quantum
PA Primary Reviewer Name	
PA Primary Reviewer Firm	
CPUC Staff Project Manager	
CPUC Staff Policy Authorization (as needed)	
CPUC Staff Recommendation:	Prospective review disposition
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
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1	<p>According to the PA, this project was initially developed under the On-Bill Financing Alternative Pathway (OBF-AP) program, but the project did not meet the population-level NMEC requirements. Therefore, the PA had to bring this project to custom and recalculate savings using the Modified Lighting Calculator. The PA submitted the project for custom project review (CPR) after it has already been implemented and claimed. The PA requested CPUC staff to waive the CPR for this project.</p> <p>Given this project has already been implemented and claimed, the CPUC staff is waiving the CPR for this project. However, we noticed several discrepancies in final reported/claimed savings values included in various project documentation (e.g., 2,165,099 kWh and 0 kW per bi-monthly upload, 2,591,118 kWh, 0 kW per post-calculations, 1,331,028 kWh, 0 kW per post-installation review, etc.). We are requesting the PA to make sure correct savings values are included in the next quarterly submission. The PA should also update the project package to make sure these discrepancies are addressed in case project is selected for future evaluations.</p> <p>We also noticed that this project does not have enough information to show program influence and preponderance of evidence (POE) for the accelerated replacement (AR) claim. The PA stated that a procedure document has been developed to address these issues for future projects that fall out of the OBF-AP program. Please provide this procedure for our review via an early opinion (EO) request within 30 days of this disposition. This procedure should include details to explain qualifying parameters for the population-level NMEC projects, screening process (why some projects do not qualify for the population based NMEC program), and the procedure for bringing screened out projects to compliance with custom requirements (e.g., listing on the bi-monthly upload, calculation approach, POE, and program influence documentation, etc.). This procedure should also explain how the PA update OBF terms and/or</p>	PA program rules		

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>
Advisory.	The PA is not formally required to follow instructions or recommendations given in an Advisory review. However, issues found will affect ESPI scoring and may come up again in Ex-Post review.