

CPUC Staff Ex Ante Review

CPUC Staff Project ID Number	PGE_22_C_0_824_Site Specific Comprehensive - 40916_NMEC
CPMA Directory Link	https://deeresources.info/cmpa/projects/20664
PA	PGE
PA Application ID	Site Specific Comprehensive - 40916
PA Application Executed Date	
PA Program ID	COWBKWSL20
PA Program Name	kW Engineering - Smart Labs Com - Whole Building
PA Program Year	
Date of CPUC Staff Review:	3/7/2023
PA CMPA Upload Dates Included in this review:	
First PA Upload	12/6/2022
Second PA Upload	1/23/2023
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:	This meter-based project involves retrocommissioning and add-on equipment in laboratory spaces at a research facility in South San Francisco California
Bi-Monthly Upload kW Demand Reduction	0.0
Bi-Monthly Upload Annual kWh Impacts	626,977.0
Bi-Monthly Upload Therm Impacts	46,009.0
PA Proposed Incentive \$ (to Customer)	\$85,701.00
Project Documentation kW Demand Reduction	0.0
Project Documentation Annual kWh Impacts	626,976.0
Project Documentation Annual Therm Impacts	46,008.0
Project Documentation Incentive \$ (to Customer)	85,701.0
CPUC Staff Primary Reviewer Name	
CPUC Staff Primary Reviewer Firm	DNV
CPUC Staff Review Supervisor Name	
CPUC Staff Review Supervisor Firm	DNV
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	Please correct the project address included in bimonthly upload (BMU) data to reflect the service address listed in PPP verification documentation.	Other 1		
2	Submitted documentation show contradictory kWh savings claims: 583,369 kWh (PFS and Attachment C) and 626,976 kWh (BMU and PA technical review). Please confirm that the most up-to-date kWh savings estimate is reflected in BMU data.	Other 2		

3	<p>Measure application types for two of the three project sub-measures are BRO-Retro-commissioning (RCx). According to NMEC Rulebook Version 2.0 pages 9-10, for BRO measures "the program participant or project owners must commit to a repair and maintenance plan for a minimum of three years via a signed customer agreement under which the repair and maintenance activities will continue." The project submittal did not include a maintenance plan; please submit the maintenance plan signed by the customer prior to measure implementation.</p>	Missing documents		
4	<p>The project submittal did not demonstrate that the CAV-to-VAV measure (EEM-2) brings the system to conformity with CA Title 24 as intended for NMEC programs in AB 802. The project occurs at a laboratory facility, and EEM-2 involves conversion of exhaust systems from CAV to VAV control. As a result, compliance with CA Title 24 Section 140.9.c.1 should be assessed. The Title 24 provision varies depending on the air changes per hour of the exhaust system; please provide this information when confirming conformity with Title 24.</p>	Baseline		
5	<p>The submittal did not comply with the program influence requirements stipulated in Resolution E-5115 and the Statewide Custom Guidance Document. Specifically, the submittal did not include evidence (e.g., emails, meeting minutes) supporting specific claims of influence in the narrative. Additionally, the submitted documentation did not address the requirements of sections 4.3 and 4.4 of Resolution E-5115. Please collect relevant evidence supporting the influence narrative prior to project implementation.</p>	Program influence		

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.