

CPUC Staff Ex Ante Review

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| CPUC Staff Project ID Number | PGE_22_C_C_740_Site Specific Comprehensive - 31700_NMEC |
| CPMA Directory Link | https://deeresources.info/cmpa/projects/19824 |
| PA | PGE |
| PA Application ID | Site Specific Comprehensive - 31700 |
| PA Application Executed Date | |
| PA Program ID | INWBISO20 |
| PA Program Name | Cascade - INDUSTRIAL SYSTEMS OPTIMIZATION PROGRAM (ISOP) - Whole Building |
| PA Program Year | |
| Date of CPUC Staff Review: | 3/15/2022 |
| PA CMPA Upload Dates Included in this review: | |
| First PA Upload | 2/1/2022 |
| Second PA Upload | N/A |
| 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: | Site-level NMEC project resulting from identification and implementation of refrigeration system BRO measures at 246,000sf refrigerated storage and distribution facility. |
| Bi-Monthly Upload kW Demand Reduction | 0.0 |
| Bi-Monthly Upload Annual kWh Impacts | 421,600.0 |
| Bi-Monthly Upload Therm Impacts | 0.0 |
| PA Proposed Incentive \$ (to Customer) | \$7,805.40 |
| Project Documentation kW Demand Reduction | 0.0 |
| Project Documentation Annual kWh Impacts | 698,000.0 |
| Project Documentation Annual Therm Impacts | 0.0 |
| Project Documentation Incentive \$ (to Customer) | 19,514.0 |
| CPUC Staff Primary Reviewer Name | |
| CPUC Staff Primary Reviewer Firm | Verdant Associates |
| CPUC Staff Review Supervisor Name | |
| CPUC Staff Review Supervisor Firm | Quantum Energy Analytics |
| 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 |
|----------------|--|------------------------------|-------------|---------------|
| 1 | Please resubmit this project for our review at the end of year 1 performance period when final savings are estimated. | Continue Document Upload | | |
| 2 | There are some discrepancies in reported savings between project documentation and the bi-monthly upload (BMU). The original pre-installation savings estimated using bottom-up calculations are 698,000kWh, 0kW, and Otherms. These values are supported by live calculations and used in the PFS. The BMU and the Energy Insight report show that savings were revised to be \$421,600kWh, 0kW, and Otherms. The PA did not provide supporting calculations for the revised savings. Please make sure that correct savings and incentive values are included in the next quarterly submission. | Other 1 | | |
| 3 | The PA did not provide live calculations/modeling files to support savings reported in the BMU. Please make sure to provide this information as part of the next submission. | Missing required information | | |

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| 4 | <p>The project scope is unclear. It appears that the project involves five BRO measures that were implemented during the Tune-up event, along with a number of Quick Wins. The PA did not clearly document details of Quick Wins that have already been implemented. Also, two additional measures (install strip curtains and program office HVAC control system) are included in the PFS but it is not clear when these measures will be installed. According to the PA, the revised energy savings of \$421,600 kWh that was verified with 3-month of performance data includes savings from five BRO measures and 32 quick wins. The Optimization Event Report shows that only a handful of Quick Wins were implemented at the time of Tune-up event.</p> <p>Please provide a clear description of the project scope including a full list of measures and implementation timeline for future submission of this project.</p> | Project scope unclear | | |
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| Note or Instruction Number: | CPUC Staff Notes or Instructions: | Instruction Category | PA Response | ED Resolution |
|-----------------------------|--|----------------------|-------------|---------------|
| 1 | The PA submitted this project on BMU after several measures have already been installed and 3 months of performance data has been collected. Given this process (i.e., submitting the project on the BMU after measures have already been installed) is different than the custom project review (CPR) process, we are requesting the PA to discuss CPR timeline for projects implemented under the industrial Systems Optimization Program (ISOP) program with the CPUC staff for future projects. | CPUC Policy | | |
| 2 | The site has a solar PV system that was not in operation during a portion of the pre-installation period. We will review the non-IOU fuel source analysis during the post-installation review step. | Other 2 | | |
| 3 | <p>According to the PA, this project is a normalized metered energy consumption (NMEC) project implemented under an approved NMEC program. ISOP uses an opt-in, single-point-of contact program delivery model for industrial, manufacturing and food processing customers to motivate energy savings through PG&E's deemed, custom, NMEC, and on-bill financing platforms. ISOP NMEC projects will calculate savings using site-level NMEC methodology. The PA included a Program-Level M&V in the Implementation Plan filing for the program. The Program-Level M&V Plan provides details on a list of topics specified in the NMEC Rulebook.</p> <p>According to the Rulebook for Programs and Projects Based on Normalized Metered Energy Consumption, version 2.0, NMEC is not permissible for industrial operations and maintenance (O&M) or behavior, retrocommissioning, and operations (BROs)-type projects except as a component of Commission defined Strategic Energy Management Programs. Additionally, according to the same rulebook, site-level NMEC projects in industrial buildings are permissible, to the extent they are similar to one that would be carried out in a commercial building.</p> <p>Given the ISOP program targets industrial customers, and this project is being implemented at a cold storage facility, it is not clear to us whether this project should be allowed as an NMEC project. We are allowing this project to move forward as an NMEC project but requesting the PA to clarify why this should be allowed.</p> | CPUC Policy | | |
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| CPUC Staff Recommendation Definitions | |
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| 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. |