

CPUC Staff Ex Ante Review

CPUC Staff Project ID Number	PGE_22_C_C_744_Site Specific Comprehensive - 35582_NMEC
CMPA Directory Link	https://deeresources.info/cmpa/projects/20174
PA	PGE
PA Application ID	Site Specific Comprehensive - 35582
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:	6/21/2022
PA CMPA Upload Dates Included in this review:	
First PA Upload	3/8/2022
Second PA Upload	4/5/2022
Third PA Upload	5/27/2022
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:	NMEC whole building project at a university campus laboratory with the following measures lab airflow rebalance fume hood airflow reductions exhaust fan speed reduction SAT deadband
Bi-Monthly Upload kW Demand Reduction	63.0
Bi-Monthly Upload Annual kWh Impacts	950,247.0
Bi-Monthly Upload Therm Impacts	66,344.0
PA Proposed Incentive \$ (to Customer)	\$128,000.00
Project Documentation kW Demand Reduction	63.0
Project Documentation Annual kWh Impacts	950,247.0
Project Documentation Annual Therm Impacts	66,344.0
Project Documentation Incentive \$ (to Customer)	128,196.0
CPUC Staff Primary Reviewer Name	
CPUC Staff Primary Reviewer Firm	Verdant
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 the project for post-installation review.	Continue Document Upload		

2	<p>The program influence documentation is missing some key information and we are requesting the PA to provide this information as part of post-installation package. The program influence narrative does not provide any details on what the customer would have done absent the program, customer implementation barriers, customer resource constraints, and decision making criteria. It is also not clear how this project was initiated and whether the customer was already aware of these savings opportunities. This information is often provided as part of the project feasibility study (PFS) but the PA is not using the statewide PFS template.</p> <p>According to the PA, the statewide PFS is designed for use in custom projects not NMEC projects. The PA has allowed implementers to optimize reports based on their internal workflows but stated that these files contain major elements of the statewide PFS for custom projects, including description of program influence. According to the program-level Measurement and Verification (M&V) plan, the program influence narrative for projects implemented under this program will include a record of the program team's engagement and communications with the customer, the customer's decision-making criteria and the project timeline, and will describe how the project was initiated, how the measures were identified, alternative viable options that may also meet the customer's needs, and the energy and non-energy benefits.</p> <p>We did not find this information in the project package. For this project, we request the PA to provide the information as part of the future submission of this project. We also request the PA to ensure that the project feasibility reports include all required program influence information and meet the program-level requirements as stated in the program-level M&V plan.</p>	Program influence		
3	<p>In addition to the program influence section, the project eligibility section was also very light and the PA did not clearly explain the non-IOU fuel source analysis and the power supply/transportation arrangement for this customer in this section. This customer is a PG&E Split-Wheeling Departing Load customer on the E-SDL tariff that receives power from WAPA over PG&E infrastructure. The customer pays non-bypassable charges, including PPP on the portion of their load that was served by PG&E but departed and is now served by WAPA. According to the PA there is no end date for the departing load tariff and PPP payments. According to CPUC Decision 10-02-003, IOU energy efficiency incentive payments to direct access customers are capped based on the departing load on which they pay public purpose charges.</p> <p>We request the PA to clarify how much the departing load cap is. We also request the PA to provide the cumulative savings for all projects associated with this customer since 2019. The cumulative savings should include all projects implemented under Smart Labs program as well as other programs (e.g., UC/CSU partnership). Given there are other ongoing projects for this customer, we request the PA to provide this information as early as possible.</p>	Eligibility		

Note or Instruction Number:	CPUC Staff Notes or Instructions:	Instruction Category	PA Response	ED Resolution
1	The address included in the bi-monthly upload is a general address associated with the campus and does not match the project building address.	Other 1		
2	3-year maintenance plan will be provided for BRO measures as part of the post-installation package.	Continue Document Upload		
3	The PA used a model training period prior to the pandemic (1/1/2019-12/31/2019), assuming that the building will return to pre-COVID level of occupancy by the reporting period. It is not clear how the PA is planning to ensure occupancy is back to pre-pandemic level. The PA should clarify this approach in the post-installation package. According to the NMEC rulebook, the time between the end of the baseline period and the completion of the Project Implementation stage should not exceed 18 months.	Continue Document Upload		
4	The PA did not explain how measurement errors will be included in the overall uncertainty analysis. Please calculate a combined metering uncertainty and modeling uncertainty as described in ASHRAE Guideline 14-2014 Appendix B and provide that as part of future submissions of this project.	Continue Document Upload		
5	About 30% of total campus usage is provided by solar and hydro and the rest is provided by WAPA.	Other 1		
6	R^2 value for electric baseline model is below guidance of 0.7. FSU is reported for 10% savings (PFS savings are higher)	Other 2		

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.