

CPUC Staff Ex Ante Review

CPUC Staff Project ID Number	PGE_22_C_C_831_PRJ - 03622414_Lighting
CPMA Directory Link	https://deeresources.info/cmpa/projects/20677
PA	PGE
PA Application ID	PRJ - 03622414
PA Application Executed Date	
PA Program ID	OBF210911
PA Program Name	On-Bill Financing Alternative Pathway
PA Program Year	
Date of CPUC Staff Review:	1/10/2023
PA CMPA Upload Dates Included in this review:	
First PA Upload	11/29/2022
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	LIGHTING RETROFITNEW-EXT-LED-PARKING GARAGE
Measure 2	
Measure 3	
Measure 4	
Measure 5	
Measure 6	
Measure 7	
Measure 8	
Measure 9	
Measure 10	
PA Project Description:	Facility wide comprehensive lighting retrofit receiving OBF loan without incentive
Bi-Monthly Upload kW Demand Reduction	626.0
Bi-Monthly Upload Annual kWh Impacts	3,278,738.0
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	3,278,738.5
Project Documentation Annual Therm Impacts	0.0
Project Documentation Incentive \$ (to Customer)	0.0
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
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1	<p>The review team recognizes that this project was originally intended for PGE's On-Bill Financing Alternative Pathways Program (OBF-AP) but was redirected to custom. The review team identified key differences when comparing the project's savings calculation with the savings calculation methodology recommended for custom lighting projects (i.e., the Modified Lighting Calculator (MLC)). The project savings calculation did not address the following components that are necessary considerations for custom lighting projects:</p> <ul style="list-style-type: none"> - Peak demand savings - the review team could not validate the summer peak demand savings claim of 626 kW within submitted calculation files. - HVAC interactivities - though the project involves fixture retrofits among a variety of conditioned interior spaces, savings do not appear to account for heating and cooling interactivities. - Lumen output - the MLC compares lumen output values of baseline and proposed fixtures to ensure equivalent level of service; the submitted analysis did not address lumen output. 	Calculation tool		
2	<p>Project files reference solar PV and wind generation occurring at the facility, but the submitted savings analysis does not account for possible impact of non-IOU generation on the claimable savings.</p>	Self generation		
3	<p>Submitted electric utility bills did not indicate payment of public purpose program (PPP) surcharges.</p>	Missing documents		

Note or Instruction Number:	CPUC Staff Notes or Instructions:	Instruction Category	PA Response	ED Resolution
1	The MLC relies on DEER-based annual hours of operation for lighting fixtures by facility type. The review team found that the DEER annual operating hours for the selected building type were 40% lower than the average annual operating hours (weighted by claimed kWh savings by fixture line item) reflected in the OBF savings claim. As a result, the OBF savings claim is significantly higher than what would have been claimed through the typical custom track.	Analysis assumptions		

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.