

CPUC Staff Ex Ante Review

CPUC Staff Project ID Number	PGE_22_C_C_837_Site Specific OBF - 52287_None
CMPA Directory Link	https://deeresources.info/cmpa/projects/20684
PA	PGE
PA Application ID	Site Specific OBF - 52287
PA Application Executed Date	
PA Program ID	OBFSSPGE19
PA Program Name	On-Bill Finance Site Specific
PA Program Year	
Date of CPUC Staff Review:	2/14/2023
PA CMPA Upload Dates Included in this review:	
First PA Upload	12/20/2022
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:	An OBF project with a site-specific NMEC savings claim at an office building with lighting and HVAC measures
Bi-Monthly Upload kW Demand Reduction	25.0
Bi-Monthly Upload Annual kWh Impacts	341,595.7
Bi-Monthly Upload Therm Impacts	9,777.8
PA Proposed Incentive \$ (to Customer)	\$0.00
Project Documentation kW Demand Reduction	25.0
Project Documentation Annual kWh Impacts	341,595.7
Project Documentation Annual Therm Impacts	9,777.8
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
----------------	--	-----------------	-------------	---------------

1	<p>The NMEC rulebook (page 15) requires that the baseline adjustment model be assessed for goodness-of-fit and references the proposed thresholds from LBNL Technical Guidelines. These thresholds are <25% for CV(RMSE), NMBE between -0.5% and +0.5%, and R2 >0.7. For this project, the gas baseline model does not meet the CV(RMSE) threshold, as the CV(RMSE) is 75.63%. In accordance with Early Opinion 2022-05 (Commission response dated 7/29/22), the review team recommends that the PA and implementer choose one of the following options:</p> <ul style="list-style-type: none"> • Make the entire project a regular (non-NMEC) custom project and claim both gas and electric savings. Under this option, the appropriate custom calculation approach should be used to estimate both electric and gas savings, and the entire project should follow the custom project review (CPR) process and requirements. • Make the project an electric-only NMEC project, and do not claim gas savings but do account for gas interactive effects. 	Calculation method		
2	<p>The project submittal did not include any documentation related to program influence, as required for all custom projects. Statewide Custom Guidance Document Version 1.4 Sections 2.1 and 3.2 and Appendix D outline the documentation required to demonstrate technical and financial influence of the program on the customer's decision-making. Please submit key influence documentation including: the narrative and evidence surrounding the 8 criteria listed on pages 57-59 of the Statewide Guidance Document; copies of communications and supporting documents to and from end-use customers that document when and how the customers made their decisions; and a comprehensive timeline of interactions between the customer, PA, and implementer illustrating the evolution of the project and who initiated contact during each stage.</p>	Program influence		
3	<p>Submitted documentation includes contradictory information on the measure application type for one of the project measures (EEM-2 AHU DDC Upgrades). For example, page 14 of the PFS identifies the measure as Behavioral, Retro-commissioning, and Operational (BRO), whereas pages 21 and 23 of the PFS identify the measure as Accelerated Replacement. Please confirm that the final MAT is BRO, and please revise the project documentation to be consistent.</p>	Measure type		
4	<p>The NMEC rulebook (page 10) requires for BRO measures a "repair and maintenance plan for a minimum of three years via a signed customer agreement." While the project submittal included a repair and maintenance plan, the review team found that the plan did not sufficiently detail the relevant points to be monitored, intervals, and tolerable thresholds to ensure the AHU control modifications persist. Additionally, the maintenance plan is not signed by the customer.</p>	Other 1		

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.