

CPUC Staff Ex Ante Review

CPUC Staff Project ID Number	PGE_22_P_C_753_PRJ - 02270960 Lighting
CMPA Directory Link	https://deeresources.info/cmpa/projects/20214
PA	PGE
PA Application ID	PRJ - 02270960
PA Application Executed Date	
PA Program ID	PGE2110051
PA Program Name	LGEAR - Staples Direct Install
PA Program Year	
Date of CPUC Staff Review:	5/24/2022
PA CMPA Upload Dates Included in this review:	
First PA Upload	4/6/2022
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-OTHER
Measure 2	
Measure 3	
Measure 4	
Measure 5	
Measure 6	
Measure 7	
Measure 8	
Measure 9	
Measure 10	
PA Project Description:	LED Lighting Retrofit
Bi-Monthly Upload kW Demand Reduction	9.2
Bi-Monthly Upload Annual kWh Impacts	168,228.3
Bi-Monthly Upload Therm Impacts	0.0
PA Proposed Incentive \$ (to Customer)	\$21,567.40
Project Documentation kW Demand Reduction	9.2
Project Documentation Annual kWh Impacts	203,130.2
Project Documentation Annual Therm Impacts	0.0
Project Documentation Incentive \$ (to Customer)	20,187.0
CPUC Staff Primary Reviewer Name	
CPUC Staff Primary Reviewer Firm	DNV
CPUC Staff Review Supervisor Name	
CPUC Staff Review Supervisor Firm	DNV, Quantum
PA Primary Reviewer Name	
PA Primary Reviewer Firm	
CPUC Staff Project Manager	
CPUC Staff Policy Authorization (as needed)	
CPUC Staff Recommendation:	Application ready to proceed with exception(s), as noted
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	Per E-5115, all accelerate replacement (AR) projects should include a signed Customer Affidavit Statement to ensure the project preponderance of evidence documentation is accurate. The customer affidavit statement included by the PA does not reflect the approved language in E-5115. Given this project has already been implemented, we are allowing this project to go through but the PA is required to provide the signed affidavit statement with the correct language (as required by E-5115) for future projects. In addition to this, the PA is required to update the accelerated replacement questionnaire (ARQ) based on the E-5115 requirements and submit that for CPUC approval as an early opinion request (ARQ). The original EO was submitted prior to E-5115 and it does not appear that PA has updated the ARQ based on E-5115.	ER preponderance of evidence		

2	<p>The original submitted documentation did not justify the significant cost difference between standard-practice and installed LED fixtures. Please note that CPUC staff has provided guidance via Modified Lighting Calculator EO responses and past dispositions on how incremental cost (IMC) should be estimated. Per our prior guidance, IMC estimations should be unsupported by actual bid costs for alternative equipment that provide an equivalent level of service performance and meet all customer anticipated functional, technical, and economic needs. IMC must be estimated using product pairs priced by the same or equivalent suppliers so that the calculated IMC equals the likely real equipment cost differential. Also, pricing should be done for the actual quantity of equipment installed for the project. Please note that it's the PA's responsibility to perform an accurate review of cost data during the PA's internal review process.</p>	<p>Did not follow previous CPUC guidance</p>		
---	--------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------------	----------------------------------------------	--	--

Note or Instruction Number:	CPUC Staff Notes or Instructions:	Instruction Category	PA Response	ED Resolution
1	The baseline lighting fixtures are not turned on in the photos submitted in the project package.	ER preponderance of evidence		
2	There are some savings discrepancies between project files. The PA indicated that final savings will be updated in the next quarterly submission.	other -1		

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.