

CPUC Staff Ex Ante Review

CPUC Staff Project ID Number	PGE_22_P_C_756_PRJ - 02334279_Lighting
CMPA Directory Link	https://deeresources.info/cmpa/projects/20257
PA	PGE
PA Application ID	
PA Application Executed Date	
PA Program ID	PGE210143
PA Program Name	Hospitality Program - Custom Direct Install
PA Program Year	
Date of CPUC Staff Review:	5/24/2022
PA CMPA Upload Dates Included in this review:	
First PA Upload	4/12/2022
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-WALL MOUNTED
Measure 2	
Measure 3	
Measure 4	
Measure 5	
Measure 6	
Measure 7	
Measure 8	
Measure 9	
Measure 10	
PA Project Description:	██████████-EXT-MLTG 2022 an exterior lighting upgrade project replacing 1394 HID lighting fixtures with high-efficiency DLC-Premium LED lighting
Bi-Monthly Upload kW Demand Reduction	0.0
Bi-Monthly Upload Annual kWh Impacts	3,083,226.8
Bi-Monthly Upload Therm Impacts	0.0
PA Proposed Incentive \$ (to Customer)	\$369,987.22
Project Documentation kW Demand Reduction	0.0
Project Documentation Annual kWh Impacts	3,083,226.8
Project Documentation Annual Therm Impacts	0.0
Project Documentation Incentive \$ (to Customer)	369,987.2
CPUC Staff Primary Reviewer Name	
CPUC Staff Primary Reviewer Firm	DNV
CPUC Staff Review Supervisor Name	
CPUC Staff Review Supervisor Firm	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 without exception
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>According to the Statewide Custom Project Guidance Document version 1.4, as part of the custom project development process, PAs and third-party implementers need to demonstrate that the energy efficiency program caused a net benefit for the ratepayers by enticing the customer to implement a more costly, more efficient project than they were otherwise planning to implement absent the program intervention. The net impact is determined based on real and convincing evidence of program influence included in the documentation submitted for every custom project. The evidence of program influence should outweigh evidence that suggests the customer would have chosen the efficient alternative absent the program information or financial support.</p> <p>Our research shows that this customer is actively installing LEDs in other locations (including three California ratepayer funded projects, and projects outside of California), and has sustainability goals to proactively deploy energy efficient technologies at various facilities. The PA did not provide these details in the program influence documentation. The PA should have presented this information (including the customer 2021 Sustainability Report: [REDACTED])</p> <p>and then demonstrate that the program more likely than not caused the customer to implement more efficient equipment than they would have done in absence of the program intervention. In fact, available documentation suggests that the lighting contractor initially pursued the lighting project opportunity with the customer, involving the same LED high mast lighting that has already been successfully deployed in other customer facilities. This further de-emphasizes influence stemming from program intervention. We are allowing this project to move forward but requesting the PA to provide this information for future projects.</p>	Program influence		
2	<p>The project feasibility study (PFS) discusses customer internal payback threshold and that the customer would not be able to meet their internal payback threshold without incentives but does not provide additional details on what this payback threshold is. Going forward, please clearly describe the customer's criteria in decision-making.</p>	Program influence		

Note or Instruction Number:	CPUC Staff Notes or Instructions:	Instruction Category	PA Response	ED Resolution
1	The address listed on the project feasibility study does not match the address listed in the bi-monthly upload. Please update the next quarterly submission to use the correct address.	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.