

CPUC Staff Ex Ante Review

CPUC Staff Project ID Number	PGE 22 T 0 803 Site Specific Comprehensive - 47660_NMEC
CMPA Directory Link	https://deeresources.info/cmpa/projects/20512
PA	PGE
PA Application ID	Site Specific Comprehensive - 47660
PA Application Executed Date	
PA Program ID	COWBGCRX20
PA Program Name	kW Engineering CoolSave Grocery - Whole Building
PA Program Year	
Date of CPUC Staff Review:	11/21/2022
PA CMPA Upload Dates Included in this review:	
First PA Upload	8/29/2022
Second PA Upload	10/5/2022
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:	Grocery Store efficiency Project with five energy efficiency measures including adding doors to refrigeration cases replacing evaporator fan motors and optimizing control settings
Bi-Monthly Upload kW Demand Reduction	40.0
Bi-Monthly Upload Annual kWh Impacts	343,125.0
Bi-Monthly Upload Therm Impacts	0.0
PA Proposed Incentive \$ (to Customer)	\$41,175.00
Project Documentation kW Demand Reduction	40.0
Project Documentation Annual kWh Impacts	343,125.0
Project Documentation Annual Therm Impacts	0.0
Project Documentation Incentive \$ (to Customer)	41,175.0
CPUC Staff Primary Reviewer Name	
CPUC Staff Primary Reviewer Firm	DNV
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 NOT Required

Action Number:	Summary of CPUC Staff Required Action by the PA:	Action Category	PA Response
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1	<p>The PA did not provide sufficient program influence documentation as required by the Resolution E-5115. The PA only provided a brief narrative with a few dates (the initial contact and one follow up call), and copies of a few email communications with the customer. The PA did not provide the following program influence information:</p> <ul style="list-style-type: none"> - A complete project development timeline with notes indicating who initiated the interaction at each step. This timeline document should clearly show when different store locations (including pilot stores and this project) were considered for the program. According to the project package, the customer agreed to an initial study at two pilot stores. The PA then used this pilot to show program influence for this project, but the timing, scope and the status of the pilot projects are not provided. - List of project development steps within the timeline including customer internal steps and "key budgeting and implementation" decision dates along with interactions with the implementer and the PA. As far as budgeting and implementation decisions, the project only includes a statement about the customer internal payback criteria of 5 years but it does not provide any additional details about the customer budgeting decision for the portfolio of the stores (including pilot stores, this project and future stores). Note that this project pays back in about 3 years without incentives which is within the customer payback threshold. - Emails, meeting notes, and call logs documenting the customer barriers and issues with response from project developer answering the questions and providing solutions. The project includes some discussions about the general implementation barriers for the grocery sector, but no specific details are provided for this customer. There is also some discussions about the customer comprehensive set of best practices but the PA did not provide any details on what these best practices are and how they would impact the proposed measures. - Any alternative options the customer considered for phasing the project, delaying the project or selecting alternatives to reduce cost or accumulate budget authorization over several budgeting cycles. There is a general statement indication that the customer has a fixed budget for 2022 but it's unclear to us how the customer made the implementation decision for various stores (including this project). Given the program is targeting chain grocery stores, it's important to document the customer decision making criteria regarding phased projects during the project development steps. - References to vendors websites or equipment specifications. Please note that this information is also needed as part of the eligibility review. This is a recurring issue for the NMEC projects implemented by PG&E where the PA does not provide proposed equipment specifications. - Documentation that describe the ability of the existing equipment to meet current performance requirements (production, reliability, comfort, aesthetics, maintenance). - Assessment of regulations, codes and standards. Please note that this information is also needed as part of the eligibility review. This is a recurring issue for the NMEC projects implemented by PG&E where the PA does not provide an assessment of the applicable standard practice at the measure level. - Existing equipment make, model, and serial number - Documentation of existing equipment performance or operating data (trend logs, equipment efficiency and safety tests) <p>The program influence documentation issue is a recurring issue for the NMEC projects implemented by the PA. We have raised this issue in a number of past dispositions (e.g., 773, 764, etc.) and calls (e.g., PG&E 2022 ESPI Midyear meeting).</p>	Did not follow previous CPUC guidance	
2	Please include an estimate of gas savings in the final trued up claim for this project. DEER or workpaper values can be used to estimate interactive savings.	Analysis assumptions	

Note or Instruction Number:	CPUC Staff Notes or Instructions:	Instruction Category	PA Response
1	<p>The PA confirmed that a 3-year maintenance plan will be required at the IR stage. The details of the maintenance plan was not provided to the CPR team for review at this stage of the project.</p> <p>Please note that the nature of the maintenance plan for the CoolSave program is not discussed in any of the program documents (e.g., program implantation plan) or the submitted project files. According to HOPPs ruling, incentives for behavioral, retrocommissioning, and operational measures shall only be paid once participant commits to a maintenance plan for a minimum of three years (evidence should be made available to Commission staff upon request).</p> <p>Please provide this information for future projects.</p>	CPUC Policy	
2	<p>Two of the proposed measures (EEM-2: install EC motors on walk-in evaporator fans, and EEM-3: install EC motors on case evaporator fans) are to-code (standard practice) measures. Under deemed offerings, these measures would only qualify for RUL savings (i.e., normal replacement savings are zero). Under this NMEC program, existing condition savings will be claimed for the EUL.</p>	Other 1	
3	<p>The PA did not provide specifications of the proposed equipment.</p>	Missing required information	
4	<p>The PA did not provide an assessment of the applicable standard practice at the measure level.</p>	Missing required information	

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. 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.