

CPUC Staff Ex Ante Review

CPUC Staff Project ID Number	PGE 22 T C 752 PRJ - 03802614 Lighting
CMPA Directory Link	https://deeresources.info/cmpa/projects/20215
PA	PGE
PA Application ID	
PA Application Executed Date	
PA Program ID	PGE210143
PA Program Name	Hospitality Program - Direct Install
PA Program Year	
Date of CPUC Staff Review:	5/10/2022
PA CMPA Upload Dates Included in this review:	
First PA Upload	3/25/2022
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-INT-LED-GENERALAREA LIGHTING
Measure 2	
Measure 3	
Measure 4	
Measure 5	
Measure 6	
Measure 7	
Measure 8	
Measure 9	
Measure 10	
PA Project Description:	A lighting project at a large retailer replacing 262 LED linear strip fixtures
Bi-Monthly Upload kW Demand Reduction	6.3
Bi-Monthly Upload Annual kWh Impacts	41,682.2
Bi-Monthly Upload Therm Impacts	-202.2
PA Proposed Incentive \$ (to Customer)	\$5,537.64
Project Documentation kW Demand Reduction	6.4
Project Documentation Annual kWh Impacts	41,682.2
Project Documentation Annual Therm Impacts	-202.6
Project Documentation Incentive \$ (to Customer)	5,537.6
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:	Application rejected.
For rejection, action required:	Complete Resubmittal Required (SB1131 timeline reset)
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>According to Resolution E-4818, to avoid potential misuse of incentive cap limits (where a project might be sub-divided into multiple applications for purposes of receiving a different level of scrutiny), it seems reasonable for CPUC staff to have discretion to aggregate applications when they are from the same customer and appear to be the same project. Therefore, in order to define the appropriate rigor for the projects that are related to the same customer, incentive caps should be applied to the entire project with aggregated incentives.</p> <p>Based on the bi-monthly upload, the PA has implemented similar measures at 6 other locations for the same customer. The total incentives for all 7 projects adds up to over \$37,000 which would require a different level of POE and program influence information in accordance to the E-5115.</p> <p>Note that in an Early Opinion submitted by the PA in 2020 (PG&E Streamlined Review Process for Small Lighting Projects), the PA stated that "Multi-site projects or large customers/chains need "original" influence narrative and evidence in addition to ARQ". However, the PA did not follow this approach for this customer. Please provide this information for future submission of the project.</p>	Did not follow previous CPUC guidance		

2	In the 2020 Early Opinion for Streamlined Review Process for Small Lighting Projects, the PA stated that only small lighting projects with incentives less than \$25,000 will be submitted for custom project review (CPR) after the project installation. Given this customer's incentive including all applications exceeded this level, the PA was required to submit this project for CPR prior to implementation.	Did not follow previous CPUC guidance		
3	The site access agreement, signed customer affidavit, and program influence documentation submitted for this project belong to a different project. Please included correct documentation for future submissions of this project.	Missing required information		
4	It appears that the project includes lighting measures with approved deemed values included in active lighting workpapers. Please update savings to use deemed savings values for future submission of this project.	CPUC Policy		

Note or Instruction Number:	CPUC Staff Notes or Instructions:	Instruction Category	PA Response	ED Resolution
1	The customer affidavit language is not consistent with the CPUC approved customer affidavit language per Resolution E-5115. Given the affidavit was signed by the customer in 2020, we are including this instruction as a note. However, the PA is required to update this language for future projects.	ER preponderance of evidence		

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.