

## CPUC Staff Ex Ante Review

CPUC Staff Project ID Number	PGE 22 T C 778 Site Specific Comprehensive - 45230 NMEC
CMPA Directory Link	<a href="https://deeresources.info/cmpa/projects/20406">https://deeresources.info/cmpa/projects/20406</a>
PA	PGE
PA Application ID	Site Specific Comprehensive - 45230
PA Application Executed Date	
PA Program ID	COWBDPGE19
PA Program Name	Commercial Calculated Incentives Whole Building
PA Program Year	
Date of CPUC Staff Review:	10/18/2022
PA CMPA Upload Dates Included in this review:	
First PA Upload	6/14/2022
Second PA Upload	9/2/2022
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:	NMEC whole building for a large office space replacing lights boilers and CWCHW flow control
Bi-Monthly Upload kW Demand Reduction	7.1
Bi-Monthly Upload Annual kWh Impacts	91,755.0
Bi-Monthly Upload Therm Impacts	1,745.0
PA Proposed Incentive \$ (to Customer)	\$15,894.60
Project Documentation kW Demand Reduction	7.0
Project Documentation Annual kWh Impacts	91,755.0
Project Documentation Annual Therm Impacts	1,745.0
Project Documentation Incentive \$ (to Customer)	\$15,894.60
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:	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	The PA did not provide any evidence to support the program influence narrative. The Project Feasibility Study report describes the project development process including a scoping audit, an investment grade audit, discussions with the customer regarding the scope of the project, and the availability of financing options as a decision making factor for the customer. However, the PA did not provide any evidence (emails, meeting logs, audit reports, etc.) to support this narrative. This is a recurring issue for NMEC projects submitted by the PA. NMEC projects are not exempt from providing appropriate level of program influence evidence documentation to demonstrate what the customer was planning to do prior to the program intervention and how the program changed that decision. We have identified this issue in several past dispositions (e.g., 764, 773, etc.) but this issue has not been resolved.	Did not follow previous CPUC guidance		

2	<p>The PA used Measure Application Types (MAT) to estimate savings-weighted EULs for the project but did not clearly identify MATs for any of the measures included in this project. When we requested this information in a supplemental data request, the PA stated that PG&amp;E is not defining MATs for measures in site-level NMEC projects. Given the PA used MATs to estimate savings-weighted EULs, the PA is required to provide all underlying assumptions for estimating the savings-weighted EUL.</p> <p>Please provide all underlying assumptions for estimating savings-weighted EULs for future projects.</p>	Measure type		
3	<p>The PA did not provide analysis to show that proposed equipment meet the minimum standard practice requirements for each measure (please refer to E-4939 that adopted the re-naming of the "code baseline" to the "standard practice baseline" and the standard practice baseline definition).</p> <p>For this project, the PA did not provide information on minimum required standard practice efficacy for lighting as defined by the standard practice analysis for the Modified Lighting Calculator, minimum lighting control required per 2019 Title 24, and the minimum efficiency required by 2019 Title 24 for the boiler replacement measure. We request the PA to include this information for all NMEC projects.</p>	Eligibility		
4	<p>The PA did not use available deemed values to estimated savings for the lighting measure. Also, the lighting calculations submitted by the PA included hard coded values. Please note that NMEC projects are not exempt from providing live bottom-up calculations with assumptions that are fully supported.</p> <p>In addition to this, savings associated with the boiler replacement measures include savings from installation of an outside air reset control, but the PA documentation does indicate that this control will be implemented.</p>	Analysis assumptions		
5	<p>The occupancy NRE identification method needs to be generalizable for use in the post period. Use of date indicators based on anecdotal occupancy information is insufficient as there is no clear way to apply these indicators in the post period. According to the PA, occupancy data from building Openpath key card system is available but not included in baseline model. We recommend using occupancy data to define specific parameters for identifying times of higher than expected occupancy (for example, occupancy 3 standard deviations above the mean on weekends). The same parameters can then be used in the post period data to identify such NREs. If this is not possible, the NRE data should be dropped and the model based on normal weekend occupancy only.</p> <p>Please note that it's also necessary to track how the building occupancy changes based on the portion of the units that are leased.</p>	Analysis assumptions		
6	<p>Electric hourly model has a distinct modeling problem. The Actual vs Predicted Hourly Demand graph of the M&amp;V plan shows a clear non-random distribution of outlier residuals (green and red dots). The provided "baseline.Hourly.1" file also shows that summer months are under predicted and winter months are overpredicted, indicating a potential problem with weather normalization.</p>	Analysis assumptions		

Note or Instruction Number:	CPUC Staff Notes or Instructions:	Instruction Category	PA Response	ED Resolution

CPUC Staff Recommendation Definitions	
CPUC Staff Recommendation	Definition
<b>Application ready to proceed without exception</b>	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.
<b>Application ready to proceed with exception(s), as noted</b>	<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"> <li>• Calculation Tool</li> <li>• Calculation Methodology</li> <li>• M&amp;V Plan</li> <li>• Baseline</li> <li>• Eligibility</li> <li>• EUL/RUL</li> <li>• Measure Type</li> <li>• Program Influence</li> </ul>
<b>Application rejected.</b>	<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>
<b>Advisory.</b>	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.