

CPUC Staff Ex Ante Review

CPUC Staff Project ID Number	PGE 22 T C 784 PRJ - 03203375 Lighting
CMPA Directory Link	https://deeresources.info/cmpa/projects/20424
PA	PGE
PA Application ID	PRJ - 03203375
PA Application Executed Date	
PA Program ID	PGE210143
PA Program Name	Hospitality Program - Custom Direct Install
PA Program Year	
Date of CPUC Staff Review:	7/22/2022
PA CMPA Upload Dates Included in this review:	
First PA Upload	6/13/2022
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 HIGHBAY
Measure 2	LIGHTING RETROFITNEW-INT-LED-GENERALAREA LIGHTING
Measure 3	
Measure 4	
Measure 5	
Measure 6	
Measure 7	
Measure 8	
Measure 9	
Measure 10	
PA Project Description:	An LED lighting upgrade in a large commercial building
Bi-Monthly Upload kW Demand Reduction	57.2
Bi-Monthly Upload Annual kWh Impacts	457,853.8
Bi-Monthly Upload Therm Impacts	-3,750.4
PA Proposed Incentive \$ (to Customer)	\$61,296.26
Project Documentation kW Demand Reduction	57.2
Project Documentation Annual kWh Impacts	457,853.8
Project Documentation Annual Therm Impacts	-3,750.4
Project Documentation Incentive \$ (to Customer)	61,296.1
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 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	<p>The PA is disregarding CPUC guidance on estimating incremental measure cost (IMC) for accelerated replacement lighting retrofit project. Per CPUC staff direction to the PA (provided via responses to Early Opinions and a number of dispositions), IMC should be supported by actual bid costs for alternative equipment that provide an equivalent level of service performance. 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>This project calculated an IMC of \$300,589 for installing LED fixtures that are very similar to standard practice baseline LED fixtures.</p>	Did not follow previous CPUC guidance		

Note or Instruction Number:	CPUC Staff Notes or Instructions:	Instruction Category	PA Response	ED Resolution
1	The bi-monthly upload sector is listed as commercial but this is a manufacturing facility. Please update that in the next quarterly submission.	Other 1		
2	The program is incentivizing LED fixtures with efficacy values that are less than 50% of the market performance and only slightly better than the standard practice baseline.	PA program rules		
3	The project does not payback within the EUL	Other 2		
4	Equipment age and operating data not provided as part of the equipment viability evidence documentation	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.