

CPUC Staff Ex Ante Review

CPUC Staff Project ID Number	PGE_22_T_C_841_PRJ - 03040382_Lighting
CMPA Directory Link	https://deeresources.info/cmpa/projects/20739
PA	PGE
PA Application ID	PRJ - 03040382
PA Application Executed Date	
PA Program ID	PGE_Pub_009
PA Program Name	Willdan Public sector - Customized Retrofit Custom Lite
PA Program Year	
Date of CPUC Staff Review:	2/21/2023
PA CMPA Upload Dates Included in this review:	
First PA Upload	1/4/2023
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-POLE MOUNTED
Measure 2	
Measure 3	
Measure 4	
Measure 5	
Measure 6	
Measure 7	
Measure 8	
Measure 9	
Measure 10	
PA Project Description:	Streetlighting was upgraded from Metal Halide and High Pressure Sodium to LED
Bi-Monthly Upload kW Demand Reduction	0.0
Bi-Monthly Upload Annual kWh Impacts	306,634.9
Bi-Monthly Upload Therm Impacts	0.0
PA Proposed Incentive \$ (to Customer)	\$23,000.00
Project Documentation kW Demand Reduction	0.0
Project Documentation Annual kWh Impacts	306,634.9
Project Documentation Annual Therm Impacts	0.0
Project Documentation Incentive \$ (to Customer)	23,000.0
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>PA submitted an Accelerated Replacement Questionnaire (ARQ) form in lieu of the POE requirements for equipment viability and program influence for this project. However, the ARQ was not completed and signed until after the project was already implemented. Resolution E-5115 requires this to happen as the project is being developed and emphasizes that this should not be created or re-created after the fact. According to the Resolution E-5115, convincing program influence is typically exhibited by the project developer’s actual actions and their impacts on a specific customer’s selection decision on the technology or process option(s) considered prior to or during the customer’s decision-making process. The preponderance of evidence determination should be conducted and documentation collected early in the project development phase when eligibility and measure type are being assessed. A project developer must avoid “harvesting” a customer that has already planned for implementation activity into their program, because such project decisions happened before the developer can exercise any meaningful intervention. To prevent free-ridership, implementers should not claim influence if their engagement for the specific project does not occur before or during customer’s decision-making process, or results in no additional efficiency improvement over what the customer is planning to do anyway to meet today’s needs.</p> <p>Resolution E-5115 stresses that POE documentation should happen as a project is being developed, it should not be created or re-created after the fact.</p>	ER preponderance of evidence		

2	<p>Note that in a number of meetings and email communications (including an email sent to the PA on 7/8/2022), we have requested PG&E to work with CPUC staff to revise the process for the Small (less than \$25K incentives) Lighting projects to: (1) review and revise POE documentation per E-5115 resolution, (2) update program/project types that can be submitted for CPR after installation, and (3) update project documentation requirements (e.g., project feasibility study report). As of today, this issue is still open and the PA has only scheduled one meeting (on 2/7/2023) to provide some background to other stakeholders.</p> <p>According to E-5115, for the Low Rigor tier, the project developer should collect information from the customer and provide written responses to demonstrate program influence. The information is to include but is not limited to:</p> <ol style="list-style-type: none"> 1. Describe this project's development, including factors and decision points that led to the customer's decision to replace the existing equipment. 2. Describe the project developer's services provided to the customer and timing of developer's engagement compared to customer's decision-making process. 3. Describe any major repairs performed to the existing equipment, not related to a full system overhaul, in the last 24 months. 4. Describe any maintenance issues for the existing equipment, including maintenance costs, in the last 36 months. 5. Demonstrate that the project is not part of the customer's scheduled maintenance or equipment upgrade. Provide information to demonstrate that the customer was not going to do this energy efficiency project anyway <p>The submitted ARQ and other project documentation does not provide answer to above questions. For example, this project appears to be part of a larger audit, but the customer decision factors and decision points for this project are not clear. Timing of the developer's services as relates to this project is also unclear. In addition to these, PG&E has agreed that multi-site projects or large customers/chains need to provide original influence narrative and evidence in addition to ARQ. This information was not provided for this project.</p>	Did not follow previous CPUC guidance		
3	<p>This project has already been installed but the PA did not submit any pictures to show the actual model number of installed lighting. Given the same manufacturer and the same product line include lighting options that are not eligible for incentives, the PA should have collected pictures that shows make/model of actual fixture installed</p>	Missing documents		
4	<p>The PA did not submit detailed invoices to show separated material and labor costs. Please note that according to Willdan's Project Certification Form, itemized invoice(s) for all equipment and labor, including a listing of products, quantity, manufacturer and model number are required.</p>	Measure cost		

Note or Instruction Number:	CPUC Staff Notes or Instructions:	Instruction Category	PA Response	ED Resolution
1	Program implementor was awarded a Design-Build Energy Savings Performance Contract (ESPC) by the customer to develop and implement city-wide energy efficiency and infrastructure improvement projects. The first phase of the contract involved performing a city-wide investment grade audit and the second phase of the same awarded ESPC contract involved implementation of identified projects. The program implementer has been identifying and implementing various projects (including this project and several other lighting projects) for the customer under this ESPC since 2020. Similar lighting projects have been approved and implemented by the customer under the ongoing ESPC engagement.	Program influence		
2	PA used "Retrofit Kits for Outdoor Pole/Arm-Mounted Area and Roadway" as the measure type. It appears that these may be "Retrofit Kits for Outdoor Pole/Arm-Mounted Decorative Luminaires". Please review this selection and update it. Also, please check the inputs for lighting control as this fixture appears to have integrated control.	Analysis assumptions		

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.