

3	<p>The PA did not perform an appropriate standard practice baseline assessment for this project. According to the ISP study guide (Section 3.6 of the Energy Efficiency Industry Standard Practice (ISP) Guidance, Version 3.0), the PA is required to conduct a market-based ISP study to evaluate the correct baseline for this project. The PA did not perform this study and relied on a previously developed ISP study that was not approved by CPUC staff. Going forward, please make sure that all standard practice baseline development steps identified in E-4939 and the ISP Guide are followed during the project development stage. Also, please include a clear description of the standard practice baseline development process and how conclusions were drawn for future submission of this project.</p>	Baseline		
4	<p>The second baseline savings calculations for this project are based on very simplified assumptions that are not supported by any data. Given the level of savings associated with this project, the PA is required to provide precise step-by-step calculations and describe savings calculation methodology, equations, and assumptions. The calculation methodology description should be comprehensive and complete leaving only the final verified variables and data to be determined after project completion. Using overly simplified multipliers to estimate savings for such a large project is not acceptable. For the first baseline savings, the PA identified a number of different variables that are metered and/or have spot measurements taken but it is not clear how these values are used to estimate savings. The PA indicates that the final savings will be normalized based on production but the current savings calculations are based on average usage and no normalization is actually performed. For future submission of this project, please provide precise step-by-step calculation methodology and equations proposed to be used to estimate the expected energy savings impacts for the project with detailed descriptions associating the proposed methodology with specific equipment and systems affected by the project. The M&V plan should clearly identify how collected data will be used to estimate final savings.</p>	Calculation method		

Note or Instruction Number:	CPUC Staff Notes or Instructions:	Instruction Category	PA Response	ED Resolution
1	Electrical penalty associated with this project is not included in the bi-monthly upload. The electricity is provided by Modesto Irrigation District (MID).	Other 1		
2	There is a document titled "PRJ - 03088150 Elec Logger M&V Plan 09.09.2021A-CONF.pdf" which highlights a number of different points that are metered and/or have spot measurements taken. It isn't clear what the end result of this will be. Additionally, the PFS (PRJ - 03088150_PFS V5.0 FINAL_CONF.docx, Section 6) has a section on M&V plan, which notes that M&V is based on IPMVP option C. This section provides a table of variables that will be monitored (e.g., product in, product out, brix in, brix out, and gas usage for each of the three lines) and the PA provided this data for the baseline (between mid July 2021 - early September 2021). However, its not clear how/where these are used in the calculations. Some values don't quite seem to line up.	Other 2		

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.