

## CPUC Staff Ex Ante Review

CPUC Staff Project ID Number	PGE_23_C_876_Site Specific Comprehensive - 56327_WholeBldg
CMPA Directory Link	<a href="https://deeresources.info/cmpa/projects/20917">https://deeresources.info/cmpa/projects/20917</a>
PA	PGE
PA Application ID	Site Specific Comprehensive - 56327
PA Application Executed Date	
PA Program ID	COWBHEFI21
PA Program Name	Resource-Innovations- Healthcare Energy Fitness Initiative - Whole Building
PA Program Year	
Date of CPUC Staff Review:	7/11/2023
PA CMPA Upload Dates Included in this review:	
First PA Upload	5/30/2023
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	NMEC Whole Building
Measure 2	
Measure 3	
Measure 4	
Measure 5	
Measure 6	
Measure 7	
Measure 8	
Measure 9	
Measure 10	
PA Project Description:	This is a four-story 139000 sqft healthcare facility [REDACTED]. The proposed scope of work includes energy efficiency upgrades in HVAC system.
Bi-Monthly Upload kW Demand Reduction	57.1
Bi-Monthly Upload Annual kWh Impacts	247,610.0
Bi-Monthly Upload Therm Impacts	111,060.0
PA Proposed Incentive \$ (to Customer)	\$140,773.00
Project Documentation kW Demand Reduction	57.1
Project Documentation Annual kWh Impacts	247,610.0
Project Documentation Annual Therm Impacts	111,060.0
Project Documentation Incentive \$ (to Customer)	0.0
CPUC Staff Primary Reviewer Name	[REDACTED]
CPUC Staff Primary Reviewer Firm	DNV
CPUC Staff Review Supervisor Name	[REDACTED]
CPUC Staff Review Supervisor Firm	DNV
PA Primary Reviewer Name	[REDACTED]
PA Primary Reviewer Firm	[REDACTED]
CPUC Staff Project Manager	[REDACTED]
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

Note or Instruction Number:	CPUC Staff Notes or Instructions:	Instruction Category	PA Response	ED Resolution
1	<p>The project will be the third of three projects to be implemented at the facility since fall 2022. The first project involved lighting upgrades (completed in October 2022), while the second project involved a variety of chiller optimization measures (completed December 2022). The submitted M&amp;V plan sufficiently addresses how this project's training model will exclude impacts from the first project (lighting upgrades). However, the M&amp;V plan is unclear on how the impacts from the second project (chiller optimization) will be accounted for in this project's reporting period model. In the context of this project, the lighting and chiller measures should be treated as non-routine events, and the NMEC Rulebook requires that "Methods for identification and tracking of non-routine events and non-routine adjustments must be well substantiated and fully documented in the site M&amp;V report." The NRE treatment strategies are presumably dependent on this project's installation completion date, which is currently unknown. Nonetheless, the review team requests that, prior to project implementation, the M&amp;V plan is revised to outline the possible strategies for non-routine adjustment in order to ensure that all relevant data is collected before, during, and after measure implementation (e.g., chiller trend data to support the disaggregation of the two HVAC projects' impacts in the reporting period).</p>	M&V plan	We understand this guidance and will incorporate this feedback into the M&V plan prior to conducting M&V activities and submitting the verification report.	
2	<p>The bimonthly upload data shows a project incentive of \$140,773, but the review team was unable to validate this incentive from project documentation. The PFS and other documentation suggest that the project will be solely supported through on-bill financing, which would correspond to an incentive of \$0. Please correct the project incentive value prior to the next quarterly submission.</p>	Incentive calculation	There is an incentive. We will update and include the incentive amount in the PFS and other documentation.	
3	<p>NMEC Rulebook v2.0 page 10 requires for BRO measures that "program participant or project owners must commit to a repair and maintenance plan for a minimum of three years via a signed customer agreement". However, the submitted repair and maintenance plan did not include the customer's signature.</p>	Other 1	This will be provided with the Verification report.	
4	<p>The program name listed in bimonthly upload data differs from the OBF program indicated in the PFS.</p>	Other 2	We think PG&E may need to address this one; as far as I know we did not fill the "upload data".	

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"> <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>
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.