

## CPUC Staff Ex Ante Review

CPUC Staff Project ID Number	PGE_23_T_C_866_PRJ - 04175936_Lighting
CMPA Directory Link	<a href="https://deeresources.info/cmpa/projects/20875">https://deeresources.info/cmpa/projects/20875</a>
PA	PGE
PA Application ID	PRJ - 04175936
PA Application Executed Date	
PA Program ID	PGE210911
PA Program Name	On-Bill Financing Alternative Pathway
PA Program Year	
Date of CPUC Staff Review:	5/9/2023
PA CMPA Upload Dates Included in this review:	
First PA Upload	3/28/2023
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	OBF - Exterior Lighting LED Upgrade
Measure 2	OBF - Interior Lighting LED Upgrade
Measure 3	PROCESS RETROFITNEW-FAN-EFFICIENT UNIT
Measure 4	PROCESS RETROFITNEW-FAN-EFFICIENT UNIT
Measure 5	PROCESS RETROFITNEW-FAN-EFFICIENT UNIT
Measure 6	
Measure 7	
Measure 8	
Measure 9	
Measure 10	
PA Project Description:	Accelerated interior and exterior lighting retrofits and 3 refrigeration measures Floating HeadSuction Pressure Controls Evaporator fan optimization and Hot Liquid Defrost at a manufacturing light industrial MLI facility with agricultural processing
Bi-Monthly Upload kW Demand Reduction	74.7
Bi-Monthly Upload Annual kWh Impacts	568,827.0
Bi-Monthly Upload Therm Impacts	-635.1
PA Proposed Incentive \$ (to Customer)	\$0.00
Project Documentation kW Demand Reduction	74.7
Project Documentation Annual kWh Impacts	568,827.0
Project Documentation Annual Therm Impacts	-635.1
Project Documentation Incentive \$ (to Customer)	0.0
CPUC Staff Primary Reviewer Name	
CPUC Staff Primary Reviewer Firm	DNV
CPUC Staff Review Supervisor Name	
CPUC Staff Review Supervisor Firm	DNV
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	Please provide Appendix A of the M&V plan. The submitted documentation does not fully meet the guidance set forth in LBNL's "Guidance on Requirements for Meter-Based IPMVP Option C Savings Claims"; specifically, the submitted files do not document the presence of non-routine events and accounting of non-routine adjustments in the baseline period.	Continue Document Upload		

2	The project submittal complies with the NMEC Rulebook in certain areas but not in others. For example, page 5 of the M&V plan states that the developer will "collect a minimum of three months of post installation electric, weather, and production data for both production and non-production time periods" to inform the post installation regression model. However, the NMEC Rulebook (page 15) requires that the post-installation performance monitoring period "shall last no less than 12 months." As this project is intended to follow NMEC-like calculation procedures, please revise the M&V plan to comply with NMEC requirements on post-installation data duration.	Calculation method		
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Note or Instruction Number:	CPUC Staff Notes or Instructions:	Instruction Category	PA Response	ED Resolution
1	The refrigeration measures' savings estimates are based on ten days of measurement and verification data. Given the seasonal variability in facility-wide kW (as shown on PFS page 11), the collected data may not appropriately represent the typical compressor behavior over the course of a year.	Analysis assumptions		
2	In its assessment of fractional savings, the M&V plan considers the lighting measures' savings from the "Lighting Savings Calcs OBF" spreadsheet, not the MLC. The fractional savings after combining the MLC-based lighting savings (78,074 kWh) and refrigeration savings (490,752 kWh) is 11.8% of the facility's pre-project annual consumption.	Other 1		

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.