

CPUC Staff Ex Ante Review

CPUC Staff Project ID Number	PGE_23_T_C_869_Site Specific OBF - 54078
CMPA Directory Link	https://deeresources.info/cmpa/projects/20888
PA	PGE
PA Application ID	Site Specific OBF - 54078
PA Application Executed Date	
PA Program ID	OBFSSPGE19
PA Program Name	On-Bill Finance Site Specific
PA Program Year	
Date of CPUC Staff Review:	6/30/2023
PA CMPA Upload Dates Included in this review:	
First PA Upload	4/19/2023
Second PA Upload	5/19/2023
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:	The facility is in the agricultural sector and contains a refrigerated warehouse The proposed scope of work includes energy efficient lighting upgrades HVAC controls upgrades and refrigeration upgrades
Bi-Monthly Upload kW Demand Reduction	118.8
Bi-Monthly Upload Annual kWh Impacts	689,805.0
Bi-Monthly Upload Therm Impacts	0.0
PA Proposed Incentive \$ (to Customer)	\$0.00
Project Documentation kW Demand Reduction	118.8
Project Documentation Annual kWh Impacts	594,203.0
Project Documentation Annual Therm Impacts	0.0
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:	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
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1	It is unclear from the project submittal if the facility meets the NMEC eligibility requirements for refrigerated warehouses established in Early Opinion 2022-03 "Use of NMEC in Industrial Facilities". As described in the pre technical review, "Incoming product from fields is washed, packaged and cooled before delivery to customers." PFS page 19 describes the facility's refrigeration equipment as having "472 tons of process cooling chillers and 883 tons of space cooling evaporators, or 35% of the rated cooling load is process related." EO 2022-03 states that "a refrigerated warehouse that lowers product temperature would be a process and will not be allowed as a site level NMEC project." Please confirm project eligibility in accordance with EO 2022-03 and provide additional documentation that supports the facility's treatment as a "refrigerated warehouse that holds cold product for distribution" (per EO 2022-03).	Eligibility		
2	The project submittal did not include an accurate savings-weighted EUL as required by the NMEC Rulebook. The "Cost Effectiveness Tool" workbook includes a weighted EUL calculation, but the assumed EULs for add-on equipment measures reflect the full EUL of the add-on equipment, not the RUL of the existing host equipment.	EUL/RUL		
3	Please provide the hourly model required to substantiate the peak kW savings claim.	Calculation method		
4	The submitted monthly non-IOU analysis does not comply with Commission guidance in "Energy Efficiency Savings Eligibility at Sites with Non-IOU Supplied Energy Sources". The guidance document makes exceptions on hourly kW analysis requirements for residential and small commercial customers (peak demand < 20 kW), or for "customers other than residential and small commercial utilizing on-site... generation to reduce <i>building</i> electric demand and usage" (emphasis from the disposition author). Example 8 (page 16) from the guidance document illustrates how <i>process</i> loads should be treated in non-IOU savings analysis. As stated in disposition item #1, a significant portion of the facility's load is process-related.	Self generation		

Note or Instruction Number:	CPUC Staff Notes or Instructions:	Instruction Category	PA Response	ED Resolution
1	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 was not signed by the customer.	Missing required information		
2	As acknowledged by PG&E on CMPA, please correct the kWh savings claim to reflect the most current estimate (594,203 kWh) in the next quarterly submission.	Other 1		
3	M&V plan Section 3.3 states that "In the event that a post installation regression with goodness of fit (GOF) metrics meeting the NMEC rulebook cannot be created, estimated annual savings will be calculated as the post installation actual energy consumption minus the baseline energy consumption as predicted by the baseline regression model." This statement does not comply with the NMEC Rulebook or LBNL Option C Technical Guidelines.	Calculation method		
4	The submittal did not address if the proposed lighting systems will meet Title 24 code requirements.	CPUC Policy		

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.