

CPUC Staff Ex Ante Review

CPUC Staff Project ID Number	PGE_23_T_C_870_Site Specific OBF - 56339
CMPA Directory Link	https://deeresources.info/cmpa/projects/20891
PA	PGE
PA Application ID	Site Specific OBF - 56339
PA Application Executed Date	
PA Program ID	OBFSSPGE19
PA Program Name	On-Bill Finance Site Specific
PA Program Year	
Date of CPUC Staff Review:	6/13/2023
PA CMPA Upload Dates Included in this review:	
First PA Upload	4/26/2023
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:	The customer is a processing plant located in ██████████ CZ4 under NAICS code 110000 Project scope includes lighting only interior and exterior
Bi-Monthly Upload kW Demand Reduction	0.0
Bi-Monthly Upload Annual kWh Impacts	673,395.9
Bi-Monthly Upload Therm Impacts	0.0
PA Proposed Incentive \$ (to Customer)	\$0.00
Project Documentation kW Demand Reduction	0.0
Project Documentation Annual kWh Impacts	673,396.0
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
1	The project submittal does not include a sufficient comparison of historical weather and CZ2018 weather as required by LBNL guidelines to demonstrate the reasonableness of the baseline model's coverage of independent variables. Prior to project implementation, please provide additional detail and/or supporting calculations that demonstrate if and by how much the actual observed temperatures during the training period deviate from CZ2018 weather data.	Analysis assumptions		

2	<p>It is unclear if the kWh savings estimate accounts for non-IOU generation. The submittal includes an hourly non-IOU generation analysis that discounts the preliminary hourly savings estimate of 682,200 kWh by 0.3% to 679,987 kWh. However, neither of these values match the 673,396 kWh savings estimate reflected in the OBF Lighting Workbook and bimonthly upload. Prior to the next quarterly submission, please revise the kWh savings estimate to discount the brief periods when non-IOU generation exceeds the facility's load.</p>	Self generation		
3	<p>The project submittal does not address if the proposed fixture upgrade will meet Title 24 lighting power density requirements for warehouses (Table 140.6-C) or indoor lighting control requirements (Section 130.1).</p>	CPUC Policy		
4	<p>Please revise the savings estimates in the next quarterly upload to account for heating interactive impacts, if any. The project includes upgrades to interior fixtures in presumably conditioned spaces (e.g., "office", "lunch room"). However, the affected HVAC systems and refrigeration systems are not described in the PFS or other project documents, and interactive effects are not estimated in the savings analysis. It is unclear from the project submittal if the lighting upgrades in interior conditioned spaces could result in heating penalties and, if so, how those interactive impacts will be quantified in the post-installation period. The submittal includes a heating interactivities analysis ("Therm IE commercialinteractiveEffects") that applies a DEER2020 interactivity factor to the total kWh savings estimate to derive an annual heating penalty of 5,815 therms, but this value is not reflected in bimonthly upload data or addressed anywhere else in the submittal. Additionally, the 5,815 therms value exaggerates the potential heating penalty as it incorporates the total kWh savings estimate including exterior fixture upgrades. Please note that CPUC's response to PG&E Early Opinion 2022-05 states that "For NMEC lighting projects, where it would not be feasible to estimate gas savings using a gas model, it seems reasonable to consider using DEER interactive effects."</p>	Analysis assumptions		

Note or Instruction Number:	CPUC Staff Notes or Instructions:	Instruction Category	PA Response	ED Resolution
1	The fractional savings uncertainty (FSU) analysis considers 7.3% as the savings share (cell O4 in the "Baseline Reg no NRE" tab of the Regression Model spreadsheet). However, the savings share is 5.2% when considering the facility's non-IOU generation, corresponding to an FSU of 32%.	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.</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.