

CPUC Staff Ex Ante Review

CPUC Staff Project ID Number	PGE 20 C 529 Site Specific Project - 920 NMEC
CMPA Directory Link	https://deeresources.info/cmpa/projects/18604
PA	PGE
PA Application ID	Site Specific Project - 920
PA Application Executed Date	
PA Program ID	GPNMCUCC19
PA Program Name	University of California/California State University - NMEC Whole Building
PA Program Year	
Date of CPUC Staff Review:	10/19/2022
PA CMPA Upload Dates Included in this review:	
First PA Upload	9/21/2020
Second PA Upload	10/19/2020
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:	Whole building NMEC
Bi-Monthly Upload kW Demand Reduction	151.7
Bi-Monthly Upload Annual kWh Impacts	887,905.0
Bi-Monthly Upload Therm Impacts	114,839.0
PA Proposed Incentive \$ (to Customer)	\$188,975.00
Project Documentation kW Demand Reduction	127.0
Project Documentation Annual kWh Impacts	800,951.0
Project Documentation Annual Therm Impacts	38,555.0
CPUC Staff Primary Reviewer Name	
CPUC Staff Primary Reviewer Firm	DNV
CPUC Staff Review Supervisor Name	
CPUC Staff Review Supervisor Firm	Quantum
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:	[specify whether or not post M&V review is required]

Action Number:	Summary of CPUC Staff Required Action by the PA:	Action Category	Due Date	PA Response	ED Resolution
1	NMEC project review is advisory only. Please submit first year performance report	Continue Document Upload	After year 1 performance period	Post-installation M&V results were submitted by the PA on 4/14/2022	The 12 month savings report has been provided. All models have been correctly applied and model estimates are accurate to what was reported. The savings reported in the latest quarterly report (103 kW, 864,275 kWh, and 111,228 therms) should be updated from the estimated savings to reflect the cumulative modeled avoided energy consumption. Specifically, these numbers should match those shown in Table 8-1 of the savings report. The Wi-Fi connection data appears to be sufficiently accounting for occupancy variation due to the COVID pandemic. The change in scope (total incentives were reduced from \$337,857 to \$188,975) resulted in the initial incentive payment (\$127,625) to be 67% of the total incentive. We do not need more information on this item.

2	Non IOU fuel analysis was not submitted as requested in the SDR. PG&E responded by providing an interconnection agreement that states no energy will be fed from the solar plant to the grid, and thus an assessment does not need to be performed. The non-IOU fuel analysis needs to analyze grid impacts. If the project saved more energy than the grid purchase, then the grid impact would be limited to the purchase amount rather than the savings. This is not likely to happen at this site since the grid purchases greatly exceed the magnitude of the savings, but the non-IOU fuel analysis needs to comply with the rules stated in the "Energy Efficiency Savings Eligibility at Sites with non-IOU Supplied Energy Sources—Guidance Document."	Self generation	N/A	See attached Non-IOU Fuel Source SSP 920 Excel file. Hourly Savings never exceed Hourly Imports from the grid and does not affect this project.	We confirmed that the reported hourly savings never exceed hourly imports from the grid. We do not need more information on this item.
3	Based on review of the model residuals, the reviewer observed several likely outliers in the electricity and steam baseline models that were not accounted for in the model and not discussed in the Final M&V Plan. The reviewer also observed a potential non-routine event (NRE) which could account for several of the noted potential outliers. The electricity, steam, and CHW models each begin to diverge from the baseline use starting in Mid-September-Early October 2018, with residuals increasing in magnitude from that point onward. This is highlighted by the Steam model, which has residuals exceeding 3 standard deviations in the first week of November 2018. Suggestion discussion with customer to identify potential reasons for divergence, such as change in operations of the building due to start of new school semester.	Calculation method	N/A	We updated the baseline period, which still contains the periods where the CPUC has noted outliers. We have reviewed these periods and have not found there are outliers in mid-September 2018 to October 2018. We have found outliers in the CHW data for the updated baseline periods which were outside 3x standard deviation. We clarified with the customer the CHW system was being tested and concluded the outliers were part of a NRE period. This period has been removed from the baseline period. See the Post Install report for additional details on the NREs identified and how they were addressed.	The files referenced in the Post 12 month savings report addressing NREs could not be located in the provided folders (PG&E NMEC - NRE Dates Removed for Updated Analysis - Meyer Hall.xlsx and associated emails and notes). The R script called "Dates to Remove.R" lists the specific dates removed from the model but does not include the reasoning. No baseline CHW removal dates were indicated in the "Dates to Remove.R" code, as suggested in PA Response. We were not able to confirm this item. We do not need more information on this item.
4	Several issues were noted in the bimonthly upload data for this project: site address was missing and the wrong data was put in the market sector field. Please review the bimonthly upload process for this program and adjust as needed.	Other - issue with bimonthly upload	N/A	The script to pull information automatically from EI has been corrected.	The address included in the quarterly upload seems to be incorrect. Please make sure the correct address (corresponding to the project files) is included in the quarterly upload. We do not need more information on this item.
5	Errors were noted in the "Pre-Calcs" workbook affecting the calculation of kWh savings, project costs and EUL. Only 2 of the 5 recommended projects were included in the savings and cost data in the project documentation. Correction of the error increases savings from 887,905 kWh to 1,260,325 kWh and increases project cost from \$974,645 to \$1,101,835. Annual energy sums utilized for weighting factors on "EUL Table" tab were calculated incorrectly. 1 pump savings were double counted and measures with kWh savings were not converted to site kBtu prior to summation.	Calculation method	N/A	During the post-installation inspection we found that only two of the five recommended measures were implemented. We have trued-up the post-installation energy calcs to reflect what was implemented. The EUL table has been updated per the post-installation inspection and the double-counting of pump savings have been removed.	There is a discrepancy regarding whether the lab daylighting controls were commissioned. The EUL calculation does not include them and the technical review report indicates that they were not completed, but the 12 month savings progress reports indicates that they were completed February 2020. Note that the "SSP - 920 Post Savings Calcs - CONFIDENTIAL" uses an EUL of 5 years instead of 3 years for this measure. Please make sure the EUL value is corrected based on the final list of measures that have been fully installed. We do not need more information on this item.
6	Please provide a description of "how sites will be tracked to identify participation in multiple concurrent programs" in the M&V plan as called out in LBNU's NMEC Guidance.	M&V plan	N/A	The program utilizes PG&E's internal process to prevent double dipping with other Programs. Projects are entered into PG&E's Energy Insight database, and any projects entered at the same site address will be flagged. If a match is found, the Reviewer reviews the detail of the installed measures in the PG&E database to verify if the measures were installed as part of the NMEC project scope. If a measure is found to be claimed in another program, the Reviewer will notify the PM of the other program to reject or withdraw the project in the system to avoid double counting. If the project has already been paid or claimed in another program during the NMEC project period, the reviewer will amend the project savings to remove savings from the double dip measure(s).	Thanks for providing this information

Note or Instruction Number:	CPUC Staff Notes or Instructions:	Instruction Category	Due Date	PA Response	ED Resolution

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. 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>