

## CPUC Staff Ex Ante Review

CPUC Staff Project ID Number	PGE_23_T_C_884_Site Specific Comprehensive - 52331
CMPA Directory Link	<a href="https://deeresources.info/cmpa/projects/20960">https://deeresources.info/cmpa/projects/20960</a>
PA	PGE
PA Application ID	Site Specific Comprehensive - 52331
PA Application Executed Date	
PA Program ID	INWBISO20
PA Program Name	Cascade - INDUSTRIAL SYSTEMS OPTIMIZATION PROGRAM ISOP - Whole Building
PA Program Year	
Date of CPUC Staff Review:	10/10/2023
PA CMPA Upload Dates included in this review:	
First PA Upload	6/27/2023
Second PA Upload	8/28/2023
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:	Site-level NMEC project resulting from identification and implementation of refrigeration system BRO measures at 200000 sf refrigerated storage and distribution facility
Bi-Monthly Upload kW Demand Reduction	160.9
Bi-Monthly Upload Annual kWh Impacts	910,000.0
Bi-Monthly Upload Therm Impacts	0.0
PA Proposed Incentive \$ (to Customer)	\$1,925.00
Project Documentation kW Demand Reduction	160.9
Project Documentation Annual kWh Impacts	910,000.0
Project Documentation Annual Therm Impacts	0.0
Project Documentation Incentive \$ (to Customer)	1,925.0
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	<p>Several measures within this project were implemented prior to its submission for PG&amp;E and CPUC review processes. We have previously raised this issue with PG&amp;E in the context of prior projects, specifically dispositions for the 735 and 740 projects, which were implemented under the ISOP program. PG&amp;E informed us that after we issued prior dispositions, the PA discussed this matter with the program implementer, resulting in a commitment that projects initiated after February 23, 2023, will strictly adhere to the CPR timeline.</p> <p>Furthermore, aside from concerns regarding the CPR timeline, the ISOP program's approach to implementing measures at various times, some of which are installed after the NMEC performance period begins, likely undercounts savings. We have raised the same issue with previous projects, particularly the dispositions for the 735 and 740 projects, implemented under the same program. According to PG&amp;E, the implementer has agreed not to implement measures during the performance period subsequent to the PA's discussion of CPR 740's disposition with the implementer on February 23, 2023. However, there remain a few projects where implementation occurred before the issuance of CPR 740's disposition on February 2, 2023, including this project.</p> <p>It remains unclear how the NMEC model for this project will address this issue. To capture all savings, the performance period should commence only after all measures have been fully installed and fully commissioned. If this is not the case, the PA should specify that they recognize that the model will capture partial savings for measures installed during the performance period.</p> <p>Furthermore, there are concurrent updates being made to the facility alongside this project that will have an impact on the NMEC model. For instance, the customer permanently converted one of their coolers into an ice cream freezer, necessitating a reduction in suction pressure and the installation of additional compressors. The timing of this conversion in relation to the baseline and performance periods is not clearly documented in the project files. Another example is the customer's control system upgrade at the site, which, according to the PA, solely transferred existing control strategies and setpoints, without the addition of new energy efficiency strategies. The scope and timing of this upgrade are also not clearly identified in the project files.</p> <p>For this project and future NMEC projects, the PA is required to either update the final model to ensure that the baseline and performance period timelines do not overlap with the measure implementation timeline or state the clear intention of capturing partial savings. For non-project related upgrades, the PA should comprehensively document the timing and scope and ensure that the impact of these upgrades is accurately excluded from the modeled savings. It is crucial to include 1) a clear project timeline that illustrates the measure implementation timeline, 2) NMEC model timeline, and 3) the timing and scope of non-project related upgrades for this project and future NMEC projects. The conversion to an ice cream freezer should be treated as an NRE. Because the resulting NRA will directly affect savings estimates, it requires a robust engineering-based estimate of increased consumption.</p>	Calculation method		
2	<p>Delamping is considered an ineligible measure as it does not pass the measure permanency test. Please exclude this measure from the scope of the project. Additionally, the NMEC model should provide clear documentation of how the impact of removing lamps will be excluded from the model.</p>	Eligibility		

Note or Instruction Number:	CPUC Staff Notes or Instructions:	Instruction Category	PA Response	ED Resolution
1	All measures included in this project are to-code measures.	Other 1		

CPUC Staff Recommendation Definitions	
CPUC Staff Recommendation	Definition
<b>Application ready to proceed without exception</b>	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.
<b>Application ready to proceed with exception(s), as noted</b>	<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>
<b>Application rejected.</b>	<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>
<b>Advisory.</b>	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.