

CPUC Staff Ex Ante Review

CPUC Staff Project ID Number	PGE 23 C C 889 Site Specific Comprehensive - 59351
CMPA Directory Link	https://clearsources.info/cmpa/projects/20088
PA	PGE
PA Application ID	Site Specific Comprehensive - 59351
PA Application Executed Date	
PA Program ID	INWBISO20
PA Program Name	[REDACTED] - Whole Building
PA Program Year	
Date of CPUC Staff Review:	11/7/2023
PA CMPA Upload Dates Included in this review:	
First PA Upload	8/28/2023
Second PA Upload	9/21/2023
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:	This site-level NMEC project resulted from an ISOP Optimization Event at the Customer Site. We estimate an approximate 12 reduction in annual electricity consumption if all identified measures are implemented. The Optimization Event was an in-depth onsite engagement conducted by an [REDACTED] Energy Coach and a [REDACTED] Energy refrigeration engineer on July 15-16 2021.
Bi-Monthly Upload kW Demand Reduction	78.4
Bi-Monthly Upload Annual kWh Impacts	440,000.0
Bi-Monthly Upload Therm Impacts	0.0
PA Proposed Incentive \$ (to Customer)	\$8,680.00
Project Documentation kW Demand Reduction	78.4
Project Documentation Annual kWh Impacts	440,000.0
Project Documentation Annual Therm Impacts	0.0
Project Documentation Incentive \$ (to Customer)	8,680.0
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	Due Date
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1	<p>The PFS (page 9) states that "The facility brings in [redacted] produce and [redacted] from nearby farms and cools the product down quickly from field temperature to a target of 34°F." In PG&E Early Opinion 2022-03 "Use of NMEC in Industrial Facilities", Commission staff stated that "a refrigerated warehouse that lowers product temperature would be [considered] a process." NMEC Rulebook (page 8) states that "Site-level NMEC projects in industrial buildings are permissible, to the extent they are similar to one that would be carried out in a commercial building." The project developer acknowledged that 3 of the originally identified energy efficiency measures (EEMs 5, 17, and 18) affected the facility's process refrigeration systems that actively lower product temperature; as a result, the developer excluded the 3 measures from the NMEC project scope.</p> <p>The proposed NMEC modeling approach does not appear to reflect that of a commercial-like building, given that the model's two independent variables relate to production: throughput (cartons received) and seasonal production status (in production vs. idle). Each of the project measures involve BRO interventions to refrigeration equipment such as compressors, condensers, and evaporators.</p> <p>The PA and developer should amend the project submittal with additional measure-by-measure justification of eligibility in line with EO 2022-03 and the NMEC Rulebook. Measure-level examples of insufficient detail and justification include: the description of EEM-1 does not specify which condenser(s) are affected by the proposed purge; and it is unclear if "cold rooms" (as affected by EEMs 6 and 7) include equipment that actively lowers product temperature.</p>	Eligibility		
2	<p>EEM-1 involves a purge of the "house system" to remove "non-condensables." Refrigeration circuits collect non-condensable gases over time and are typically purged regularly. It is unclear whether such a measure is part of the customer's regular maintenance activities, as addressed on page 60 of the Statewide Custom Project Guidance Document.</p>	Maintenance		
3	<p>Each of the project measures are classified as BRO. Per NMEC Rulebook page 10, for BRO measures "the program participant or project owners must commit to a repair and maintenance plan for a minimum of three years via a signed customer agreement under which the repair and maintenance activities will continue." The submittal included a maintenance plan template that was not signed by the customer and did not appear to be customized to reflect this project's measures.</p>	Missing documents		

Note or Instruction Number:	CPUC Staff Notes or Instructions:	Instruction Category	PA Response	ED Resolution
1	Please add the street address numeric [REDACTED] to the facility address in bi-monthly upload data.	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"> • 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.