

**CPUC Staff Ex Ante Review**

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| CPUC Staff Project ID Number                     | PGE 23 C C 899 Site Specific OBF - 59435  |
| CPUC Directory Link                              | <a href="https://desiresources.info/enr/projects/21084">https://desiresources.info/enr/projects/21084</a> |
| PA   | PGE   |
| PA Application ID                                | Site Specific OBF - 59435   |
| PA Application Executed Date                     |   |
| PA Program ID                                    | OBFSSPGE19  |
| PA Program Name                                  | On-Bill Finance Site Specific   |
| PA Program Year                                  |   |
| Date of CPUC Staff Review:                       | 12/5/2023   |
| PA CMPA Upload Dates Included in this review:    |   |
| First PA Upload                                  | 9/20/2023   |
| Second PA Upload                                 | 10/24/2023  |
| 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  |   |
| PA Project Description:                          | Interior Exterior Lighting Upgrade at WWTP  |
| Bi-Monthly Upload kW Demand Reduction            | 121.4   |
| Bi-Monthly Upload Annual kWh Impacts             | 596,195.0   |
| Bi-Monthly Upload Therm Impacts                  | -3,829.0  |
| PA Proposed Incentive \$ (to Customer)           | \$0.00  |
| Project Documentation kW Demand Reduction        | 180.6   |
| Project Documentation Annual kWh Impacts         | 620,657.2   |
| 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 | Due Date |
|----------------|--|----------------------|-------------|---------------|----------|
| 1              | The PFS (page 12) states that "gas data has not been included in this report since this is a lighting only project and gas information is not relevant." Since no gas savings are claimed for the project, a gas model is not required. However, the project's lighting measures indirectly impact the facility's gas usage. Please revise the M&V plan to address how gas interactive impacts will be estimated in the absence of a gas model (e.g., stipulated interactive factors). Please confirm that such gas impacts are exclusively PGE-delivered gas. | Analysis assumptions |             |               |          |

| Note or Instruction Number: | CPUC Staff Notes or Instructions:  | Instruction Category | PA Response | ED Resolution |
|-----------------------------|--|----------------------|-------------|---------------|
| 1                           | The project's measures involve lighting upgrades. It is not clear from submitted documentation why an MLC-based approach could not be used for a more streamlined implementation as compared to the NMEC approach.   | Calculation method   |             |               |
| 2                           | The PFS (page 17) states that "If post-install non-IOU generation changes by more than 10% then the non-IOU analysis will be revised based on post-installation data." While such a rule-of-thumb would generally be reasonable for non-IOU energy analyses, this facility's cogeneration system is unique in that: 1) it produces 90% of annual electric energy consumed at the facility, and 2) it is a "dual fuel" system using PGE-delivered gas as well as landfill gas to power its turbines. Given these unique characteristics, the review team recommends revising the non-IOU analysis in the post-installation phase to apply the most up-to-date factor to derate the kWh savings detected in the model. | Self generation      |             |               |
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| CPUC Staff Recommendation Definitions                    |  |
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| 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"> <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> |
| 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.   |