

## CPUC Staff Ex Ante Review

CPUC Staff Project ID Number	PGE 21_C_C_637_Site Specific Comprehensive - 22665_NMEC
CMPA Directory Link	<a href="https://deeresources.info/cmpa/projects/19038">https://deeresources.info/cmpa/projects/19038</a>
PA	PGE
PA Application ID	Site Specific Comprehensive - 22665
PA Application Executed Date	9/29/2020
PA Program ID	COWBDPGE19
PA Program Name	Commercial Calculated Incentives - Whole Building
PA Program Year	2020
Date of CPUC Staff Review:	
PA CMPA Upload Dates Included in this review:	
First PA Upload	4/20/2021
Second PA Upload	5/4/2021
Third PA Upload	5/18/2021
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:	0
Bi-Monthly Upload kW Demand Reduction	16.6
Bi-Monthly Upload Annual kWh Impacts	107,448.0
Bi-Monthly Upload Therm Impacts	4,071.0
PA Proposed Incentive \$ (to Customer)	\$23,338.01
Project Documentation kW Demand Reduction	16.6
Project Documentation Annual kWh Impacts	107,448.0
Project Documentation Annual Therm Impacts	4,071.0
CPUC Staff Primary Reviewer Name	
CPUC Staff Primary Reviewer Firm	SBW Consulting
CPUC Staff Review Supervisor Name	
CPUC Staff Review Supervisor Firm	BMI
PA Primary Reviewer Name	0.0
PA Primary Reviewer Firm	0.0
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 (M&V Results and Final Calculations) Required

Action Number:	Summary of CPUC Staff Required Action by the PA:	Action Category	PA Response	ED Resolution
1	NMEC projects use existing conditions baseline and are not subject to dual baseline calculations per Resolution E-4818. However it is important to assign the MAT at the measure level for project EUL calculations. LED measures have an EUL of 12 yr. The pneumatic controls to DDC measure and HVAC VFDs are considered add-on equipment (AOE) with an EUL equal to the RUL of the host equipment (5 yr). Savings weighted EUL for the project is 6 yr. Please update the project level EUL from 15 yr to 6 yr.	EUL/RUL		M&V plan pg 7 has a sentence "The following table shows the EUL calculation for the project", but the following table does not show EULs
2	Simple payback (SPB) of 6.7 yr now exceeds the revised project effective useful life (EUL) of 6 yr. Please provide and acknowledgment per SW Custom Project Guidance Documents v 1.4 section 2.3.1.6. Note project passes the SPB incentives only < EUL test.	Eligibility		M&V plan pg 6 shows a final payback of 7.4 years not 6 years
3	Please provide an M&V plan for Option A (bottoms up) lighting and gas calculations compliant with SW Custom Projects Guidance document section 3.6.	M&V plan		A bottom-approach has been briefly mentioned for gas savings and non-interval electric meters, and they claim an attachment is submitted. Does this need a separate M&V plan?
4	SSC-22665 PGE Site MV Plan - Appendix 4_rev3 CONF.pdf references the pre PY 2020 definition of the DEER peak hours. Please update to the current definition of the DEER peak per Resolution E-4952.	M&V plan		No mention of peak hours in the new M&V plan appendix A. There is a definition of peak period = 4pm - 6pm from 7/8 - 7/10. But pg 21 of the M&V plan references the correct peak period as "Participant is located in California Climate Zone 3, which has a DEER Peak Period of 26-Aug through 28-Aug in 2022". Footnote on pg 4 needs to be updated as well

Note or Instruction Number:	CPUC Staff Notes or Instructions:	Instruction	PA Response	ED Resolution
1	Appreciate the generous derate factor applied to the bottoms up gas calculations. Is there any specific rationale behind the 50% value?	Analysis assumptions		
2	Please submit the first year performance report for review at the end of the first year performance period.	Continue Document Upload		

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"> <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>