

CPUC Staff Ex Ante Review

CPUC Staff Project ID Number	SCE_23_C_R_910
CMPA Directory Link	https://deeresources.info/cmpa/projects/21099
PA	SCE
PA Application ID	
PA Application Executed Date	
PA Program ID	SCE-13-SW-001F
PA Program Name	Residential New Construction Program
PA Program Year	
Date of CPUC Staff Review:	3/11/2024
PA CMPA Upload Dates Included in this review:	
First PA Upload	11/14/2023
Second PA Upload	2/1/2024
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	New Construction - Above Code Design - Comprehensive Whole House
Measure 2	
Measure 3	
Measure 4	
Measure 5	
Measure 6	
Measure 7	
Measure 8	
Measure 9	
Measure 10	
PA Project Description:	This project is SCEs legacy CAHP project enrolled prior to 103121 As noted in SCE-018 early opinion submitted in 2021 please refer to CPUC staffs response for more details SCE has closed the CAHP program to new enrollment effective 103121 and the Statewide program launched last year and is still in implementation This residential Single Family project consists of a mix of Townhomes across Buildings and Single Family dwellings Buildings consist of Townhomes each Building consists of Townhomes Each individual dwelling is stories high
Bi-Monthly Upload kW Demand Reduction	
Bi-Monthly Upload Annual kWh Impacts	
Bi-Monthly Upload Therm Impacts	
PA Proposed Incentive \$ (to Customer)	
Project Documentation kW Demand Reduction	
Project Documentation Annual kWh Impacts	
Project Documentation Annual Therm Impacts	
Project Documentation Incentive \$ (to Customer)	
CPUC Staff Primary Reviewer Name	
CPUC Staff Primary Reviewer Firm	
CPUC Staff Review Supervisor Name	
CPUC Staff Review Supervisor Firm	
PA Primary Reviewer Name	
PA Primary Reviewer Firm	
CPUC Staff Project Manager	
CPUC Staff Policy Authorization (as needed)	
CPUC Staff Recommendation:	Application ready to proceed with exception(s), as noted
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
1	The submitted project files lack many essential details, significantly hindering our review process. Despite the project's completion, there is no information regarding project costs provided for our review. The original submission from SCE lacked detailed incentive calculations, cost estimates, payback analysis, EUL estimates, installed equipment details, and even a clear description of the project scope and timeline. After submitting SDRs, the project's scope, costs, incentive calculations, equipment specs, and EUL that SCE will use to claim the project remain unclear. Additionally, we did not receive proof of PPP payments for this project. The project does not include a PFS that clearly includes all information necessary for our review.	Missing required information		
2	Please ensure that invoices are documented and stored in the project files.	Measure cost		
3	The project scope and the list of measures/installed efficient equipment that resulted in the estimated Delta EDRs are unclear. We don't understand installed measures that resulted from the program. Our review of models shows that the majority of the model savings come from the domestic water heater, but there is no document/information that can support the water heater model/brand used in the EnergyPro model. The hot water information provided in the compliance forms does not match the specs used in the model, so we are unsure of 1) what the measures are, 2) what is the make/model number of installed equipment, and 3) we also do not have as-built drawings that would support information used for modeling. Please ensure these issues are resolved and update the model and savings as needed. The project package should be updated with this information.	Project scope unclear		
4	Incentive calculations are incorrect. The incentive calculation workbook shows that the single-family incentive of starts from a Delta EDR of compared to the baseline. According to the CAHP rule book, for non-SDGE projects, there is a \$300/unit for entry CAHP Delta EDR of 3. Therefore, the project incentive claimed is higher than what the program prescribes. It appears that the incentive calculator accounts for the one-point kicker for each floor plan, and the incentive structure starts from delta EDR of This will lead to an overestimate of total incentives. For example, for plan which has a modeled delta EDR of Based on the CAHP handbook, the entry point is 3 for \$300/unit, and for each point up to 6, there is an incentive of \$150/unit. Therefore, for this floor plan, the incentive it will get is However, the current incentive structure sets the entry point to This leads to the incentive overestimations. Please review the incentive calculations before finalizing this project. Note that SCE has already reduced the incentives to half of the original submission in response to our SDR. This additional update will result in an additional reduction. For future projects, please ensure clear and live calculations are provided for incentive estimations. Please also updated the next quarterly submission for this project.	Incentive calculation		
5	The EUL that will be used by SCE to claim this project is not listed in the project package. This should be clearly documented in the project package before the project is finalized.	EUL/RUL		
6	The exact version of the EnergyPro tool used for this project was not provided to us. We selected several floor plan models to run with and the output EDR values are different from the submitted model. For future projects, SCE is required to specify the exact model version.	Calculation tool		

Note or Instruction Number:	CPUC Staff Notes or Instructions:	Instruction Category	PA Response	ED Resolution
1	We did not review program influence for this project, per CPUC staff response to SCE-018 Early opinion: "Given that: 1. SCE CAHP will be closing to new enrollments on October 31, 2021, and 2. SCE CAHP will transition to the new Statewide Residential New Construction program led by PG&E and implemented by TRC, that program is scheduled to launch in January 2022 CPUC ex ante review staff will not review program influence for the above listed 7 CAHP projects and new CAHP applications through October 31, 2021 so that the applications may proceed. This does not excuse SCE program staff as curators of ratepayer funds from its due diligence responsibility to collect documentation that demonstrates program influence. CPUC ex ante review staff recommends that SCE better document and describe the 'more likely than not' demonstration of program influence in the project files for these projects, and in general for all customized projects, as they could be selected for CPUC's ex post evaluations. Again, providing a presentation to developers and trade associates alone does not demonstrate program influence. SCE must for example describe and obtain information from the developer on what was the original design plans, what caused the developer to take the more expensive more energy efficient actions, how the incentives will result in a discount to the buyers, etc."	Program influence		

2	<p>The SCE review and approval of this project has delayed the project significantly. According to SCE: "A Letter of Interest and Technical Review documents, including Title 24 reports and energy models were submitted to SCE on August 14, 2020, with the intent to participate in the California Advanced Homes Program (CAHP). The project experienced significant delays with regards to the technical reviews performed by SCE. The delays were primarily attributed to a lack of resources. Performing technical reviews requires a certain level of knowledge and skillset, which very few individuals at SCE possess. The designated technical reviewer – which SCE had in place at the time when this project was first received – dealt with bandwidth constraints and personal issues which required multiple leaves of absence for months at a time. Additionally, SCE underwent reorganizations and staffing restructuring which shifted roles, responsibilities, and workload to new team members, requiring training and knowledge transfer to address the learning curve associated with providing program support.</p> <p>With new support staff in place and technical reviewers designated for program support, the training and knowledge transfer occurred, followed by a preliminary Technical Review of [REDACTED] submission performed in March 2023. At that time, it was determined the documents submitted by [REDACTED] were insufficient to complete a full Technical Review. This was communicated to [REDACTED] and in June 2023, a new set of Title 24 reports and energy models were submitted to SCE. The new documentation allowed SCE to perform a full Technical Review, and through the process, SCE identified multiple items requiring clarification, research, or correction by [REDACTED]. Frequent correspondence took place between SCE and [REDACTED] to resolve the issues identified, and in October 2023, the Technical Review was finally completed"</p>	Other 1		
3	The original project submission showed [REDACTED] of incentives. In response to our SDR, total incentives were reduced to [REDACTED]	Incentive calculation		
4	The bi-monthly upload shows [REDACTED] kWh of savings. It is unclear how this value is estimated given this program is designed to operate based on delta EDR.	Other 2		

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.