

## CPUC Staff Ex Ante Review

CPUC Staff Project ID Number	PGE_23_T_C_921_Site Specific OBF - 54471_WholeBldg
CMPA Directory Link	<a href="https://deeresources.info/compa/projects/21147">https://deeresources.info/compa/projects/21147</a>
PA	PGE
PA Application ID	Site Specific OBF - 54471
PA Application Executed Date	
PA Program ID	OBFSSPGE19
PA Program Name	On-Bill Finance Site Specific
PA Program Year	
Date of CPUC Staff Review:	3/15/2024
PA CMPA Upload Dates Included in this review:	
First PA Upload	12/28/2023
Second PA Upload	2/2/2024
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	NMEC Whole Building
Measure 2	
Measure 3	
Measure 4	
Measure 5	
Measure 6	
Measure 7	
Measure 8	
Measure 9	
Measure 10	
PA Project Description:	None
Bi-Monthly Upload kW Demand Reduction	0.0
Bi-Monthly Upload Annual kWh Impacts	178.3
Bi-Monthly Upload Therm Impacts	+1,261.0
PA Proposed Incentive \$ (to Customer)	\$0.00
Project Documentation kW Demand Reduction	178.0
Project Documentation Annual kWh Impacts	1,348,046.0
Project Documentation Annual Therm Impacts	-1,261.0
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
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1	<p>The project's baseline period overlaps with three non-NMEC OBF projects, each of which exclusively involve lighting upgrades. The estimated lighting savings are significant, exceeding the NMEC project's kWh savings claim by 76%. To account for the lighting projects' impacts to facility energy consumption, the developer excluded from the training model a portion of the 2022 baseline period that overlapped with the implementation of two lighting projects between May 2022 and September 2022. The training model's January-April 2022 period was further adjusted to reflect the reduced energy consumption evident in September-December 2022 after completion of the two lighting projects.</p> <p>As a result, the training model no longer complies with the NMEC Rulebook Version 2.0 (page 15) requirement that "the baseline adjustment model must span no less than a 12-month period." Further, the training model excludes months of the baseline period when the primary independent variable (outside air temperature) reaches values critical to several of the NMEC project's proposed HVAC improvements.</p> <p>The review team recommends that the PA pursues one of two options to account for the overlapping lighting projects while meeting the requirements of site-level NMEC projects:</p> <ol style="list-style-type: none"> <li>1. The PA could work with the implementer and developer to resubmit the NMEC projects to include the lighting upgrades in one consolidated project. This may require documented exceptions and approvals as some of the lighting measures have already been installed.</li> <li>2. The proposed NMEC measures could be delayed until at least 12 months of post-lighting upgrade facility consumption data is available to represent a new baseline period.</li> </ol>	PA program rules		
2	<p>The project includes two AOE measures involving the installation of VFDs onto chilled water pumps (EEM-3) and AHUs (EEM-5). The EUL of these measures should reflect the RUL of the host equipment, by default 5 years (1/3 EUL of host equipment) unless equipment-specific vintages can be provided that demonstrate higher RULs. The project-level EUL should be recalculated accordingly after the measure-level EULs are revised.</p>	EUL/RUL		

Note or Instruction Number:	CPUC Staff Notes or Instructions:	Instruction Category	PA Response	ED Resolution
1	Bimonthly upload data appears to have misplaced kW savings in the kWh savings field.	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.