

CPUC Staff Ex Ante Review

CPUC Staff Project ID Number	PGE_24_T_I_947_Site Specific Comprehensive - 35345
CMPA Directory Link	https://deeresources.info/cmpa/projects/21306
PA	PGE
PA Application ID	Site Specific Comprehensive - 35345
PA Application Executed Date	
PA Program ID	INWBISO20
PA Program Name	Cascade - INDUSTRIAL SYSTEMS OPTIMIZATION PROGRAM ISOP - Whole Building
PA Program Year	
Date of CPUC Staff Review:	7/16/2024
PA CMPA Upload Dates Included in this review:	
First PA Upload	6/4/2024
Second PA Upload	N/A
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:	Site-level NMEC project resulting from identification and implementation of refrigeration system BRO measures at a refrigerated storage and distribution facility
Bi-Monthly Upload kW Demand Reduction	228.3
Bi-Monthly Upload Annual kWh Impacts	1,291,000.0
Bi-Monthly Upload Therm Impacts	-37.0
PA Proposed Incentive \$ (to Customer)	\$173,280.00
Project Documentation kW Demand Reduction	228.0
Project Documentation Annual kWh Impacts	1,291,000.0
Project Documentation Annual Therm Impacts	-37.0
Project Documentation Incentive \$ (to Customer)	154,920.0
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>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 submitted documentation suggests that lowering of product temperature occurs at the facility. For example, per PFS page 7, the customer was previously interested in "quick freeze modules" that are described by the manufacturer as "the fastest way to freeze palletized product." PFS page 32 indicates significant differences in temperature setpoint between intake locations (rail dock, truck dock) and storage rooms, suggesting active cooling of product between the two locations.</p> <p>If any portions of the facility involve lowering of product temperature, the PA and developer should amend the project submittal as follows:</p> <ul style="list-style-type: none"> - Provide additional justification of eligibility in line with EO 2022-03 and the NMEC Rulebook for any measures related to refrigeration systems. Clearly indicate which compressors, condensers, and evaporators are involved with the lowering of product temperature, and claim savings for only those involved with the storage of already-chilled product. - Revise the M&V plan to describe how the eligible and ineligible savings will be differentiated within the model, given that the facility has only one electric meter. 	Eligibility		
2	<p>Per the PFS, the implementer intends to use a SEM tool to calculate demand savings. NMEC requires an hourly regression model for calculation of demand savings and the SEM tool is not a suitable replacement. If an hourly model cannot be built with the data, demand savings should not be claimed.</p>	Calculation tool		
3	<p>Per the PFS, the implementer intends to use the average of the most recent 2 years of product shipped data to normalize the Pounds Shipped independent variable in their regression model. IPMVP Option C guidelines recommend that non-temperature independent variables be normalized using performance period values. When normalized savings are calculated, the implementer should use performance period Pounds Shipped values for normalization.</p>	Calculation method		
4	<p>Please make the following corrections or clarifications related to measure-level EULs:</p> <ul style="list-style-type: none"> - Revise the EUL for EEM-9 (VFDs on trim compressors) to reflect the RUL of the host equipment. The submittal did not include the age of the host compressors, but they will presumably need replacement once the RUL expires. At that point, Title 24 Section 120.6(a) requirements for compressor speed control will be invoked. Therefore, the VFD AOE measure should only receive credit for the first period savings. - Revise the EUL for EEM-11 (lighting controls) to 8 years, to reflect the EUL of a more appropriate DEER proxy (ILtg-OccSens). - Provide the source and justification for the 15-year EUL for EEM-13 (battery room expansion). <p>Please revise the savings-weighted project-level EUL calculation once these revisions have been made.</p>	EUL/RUL		

Note or Instruction Number:	CPUC Staff Notes or Instructions:	Instruction Category	PA Response	ED Resolution
1	Please correct the incentive amount in bimonthly upload data (\$173,280), as it exceeds that in the project documentation (\$154,920).	Other 1		
2	The submittal does not describe the types of food product stored in the refrigerated warehouse. If differences in product are observed between baseline and performance periods, the refrigeration load will be affected, and these differences should be addressed as non-routine events.	Analysis assumptions		
3	Seven 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. Given that this customer has demonstrated issues with measure persistence previously, the maintenance plan should clearly describe the tactics to ensure that BRO measures persist at least three years.	Missing documents		
4	Several of the project measures involve the adjustment of setpoints (e.g., EEMs 2 and 3). We expect these adjustments to be gradual so as to not disrupt the system suddenly. The M&V plan should therefore be revised to describe how the measure implementation will be deemed complete for such measures involving gradual adjustments.	M&V plan		

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.