

CPUC Staff Ex Ante Review

CPUC Staff Project ID Number	PGE_24_T_C_928_Site Specific Comprehensive - 75764_WholeBldg
CMPA Directory Link	https://deeresources.info/cmpa/projects/21218
PA	PGE
PA Application ID	Site Specific Comprehensive - 75764
PA Application Executed Date	
PA Program ID	COWBHEFI21
PA Program Name	Resource-Innovations- Healthcare Energy Fitness Initiative - Whole Building
PA Program Year	
Date of CPUC Staff Review:	5/1/2024
PA CMPA Upload Dates Included in this review:	
First PA Upload	3/25/2024
Second PA Upload	4/15/2024
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:	Comprehensive LED lighting upgrade at a hospital
Bi-Monthly Upload kW Demand Reduction	119.0
Bi-Monthly Upload Annual kWh Impacts	634,324.0
Bi-Monthly Upload Therm Impacts	0.0
PA Proposed Incentive \$ (to Customer)	\$76,119.00
Project Documentation kW Demand Reduction	119.0
Project Documentation Annual kWh Impacts	634,327.0
Project Documentation Annual Therm Impacts	0.0
Project Documentation Incentive \$ (to Customer)	76,119.0
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
1	The hourly demand model utilizes 15-minute interval data to determine hourly kW values. The accepted standard roll-up method is to average the four 15-minute interval readings to determine hourly kW; however, the submission's model defines the hourly kW as the maximum of the four readings. Please correct the hourly baseline model prior to project implementation and ensure that the performance period's hourly kW model reflects the standard accepted roll-up method.	Calculation method		
2	The formula to calculate the fractional savings uncertainty in the Predictability Analysis workbook is incorrect. The denominator of the formula should reflect the average baseline period usage, not the total.	Calculation method		
3	<p>The submitted lighting workbook includes the following discrepancies related to HVAC interactive effects. Use of the CPUC-approved Modified Lighting Calculator for lighting savings estimation would have prevented such errors.</p> <ul style="list-style-type: none"> - The interactive cooling savings are not calculated for the interior lighting measures in conditioned spaces. - The interactive heating penalty is calculated in a separate file ("Therm Penalty Calcs v1"), but the DEER-based interactive gas impacts factor is applied to all measures including exterior (unconditioned) fixtures. 	Calculation tool		

Note or Instruction Number:	CPUC Staff Notes or Instructions:	Instruction Category	PA Response	ED Resolution
1	<p>The proposed measure application type is Normal Replacement, but the submittal includes reference to the viability of the preexisting lighting system, suggesting possible Accelerated Replacement. For example, PFS page 9 states that "the pre-existing conditions of the lighting fixtures were operational" and "Customer plans to continue with quarterly maintenance and replacing the fixtures as they burn out." Should the PA choose to pursue the Accelerated Replacement measure application type, documentation required by E-5115 for medium rigor projects should be added to the project directory.</p>	Measure type		
2	<p>The lighting measures in conditioned spaces will result in interactive heating penalties. However, the bimonthly upload claims do not include the estimated heating penalty, which should be corrected based on disposition action #3 above.</p>	Continue Document Upload		
3	<p>AB 802 requires that utility-incented measures at existing buildings "bring them into conformity with, or exceed, the requirements of Title 24 of the California Code of Regulations." Given that this project involves comprehensive lighting upgrades, the submittal must demonstrate that the proposed measures meet or exceed applicable requirements in Title 24. The submittal includes a "T24 Exemption" document that addresses Title 24 Section 141.0 which is not applicable to healthcare facilities. However, Title 24 Section 140.6 stipulates required lighting power densities (LPDs) for a variety of facility types including healthcare. To demonstrate the measure's full compliance with Title 24, the submission should have addressed how the proposed measures will meet or exceed Title 24 LPD requirements.</p>	CPUC Policy		

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.