

CPUC Staff Ex Ante Review

CPUC Staff Project ID Number	PGE_24_T_C_935_PRJ - 04741066_HVAC
CMPA Directory Link	https://deeresources.info/cmpa/projects/21242
PA	PGE
PA Application ID	PRJ - 04741066
PA Application Executed Date	
PA Program ID	PGE_COM_003
PA Program Name	Commercial Efficiency Program - Customized Retrofit
PA Program Year	
Date of CPUC Staff Review:	4/8/2024
PA CMPA Upload Dates Included in this review:	
First PA Upload	3/5/2024
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	HVAC RETROFITNEW-CONTROLS-LOCAL CONTROLS-ADD SETBACK CONTROLS
Measure 2	
Measure 3	
Measure 4	
Measure 5	
Measure 6	
Measure 7	
Measure 8	
Measure 9	
Measure 10	
PA Project Description:	It is recommended that the hotel installs a Guest Room Energy Management System which will provide deeper temperature setbacks of the room temperature setpoint and the fan operation based on the actual rental or occupancy status of the room This will also be tied into the door sensors and hotel rental EMS
Bi-Monthly Upload kW Demand Reduction	4.4
Bi-Monthly Upload Annual kWh Impacts	103,165.6
Bi-Monthly Upload Therm Impacts	5,331.6
PA Proposed Incentive \$ (to Customer)	\$19,702.87
Project Documentation kW Demand Reduction	4.4
Project Documentation Annual kWh Impacts	103,165.6
Project Documentation Annual Therm Impacts	5,331.6
Project Documentation Incentive \$ (to Customer)	19,702.9
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:	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	<p>Statewide Guidance Document Section 3.5 requires that “All custom projects must include documentation that clearly and concisely describes the calculation methodology proposed to be used to estimate the expected energy savings.” However, the PFS and associated documentation do not include sufficient explanation of the savings calculation methodology in specific cases:</p> <ul style="list-style-type: none"> -The baseline tie-in factor of 0.35, which is a hard-coded multiplier affecting the final savings claims, is not defined or contextualized in the PFS or other documents. The 0.35 factor may account for unrented guest rooms (which relates to a disposition item raised in CPR 877) but the PA should provide supporting explanation or derivation for this value. -The PFS and the savings analysis do not mention the source of the hard-coded hourly weather data used to determine the thermal loads in the savings estimation. The analysis should use CZ2022 weather data for CZ04. 	Analysis assumptions		
2	<p>The M&V plan includes gathering guestroom trend data for one month among the following data points: the total amount of time the FCUs are operating in heating mode, cooling mode, low fan speed and high fan speed; occupancy status; and temperature setpoints. The M&V plan should be revised to account for the following:</p> <ul style="list-style-type: none"> -It is unclear how one month of trend data will be extrapolated to represent a full year of heating and cooling operation. Please revise the M&V plan to include a comparison of the observed outdoor air temperatures (OATs) during the post installation period with annual heating and cooling OAT ranges from CZ2022 CZ04 weather files. The data collection period should be extended beyond a month if insufficient OAT coverage is determined. Note that this concern was also raised with CPR 877. -Please revise the M&V plan to describe if/how the 0.35 tie-in factor and associated rental data will be confirmed or modified as part of post M&V. 	M&V plan		
3	<p>Per the Statewide Project Guidance Document Appendix D, custom project documentation should provide both the narrative and evidence to support the claim of program influence. The PFS provides a narrative and timeline, but sufficient evidence has not been provided to support those claims. Examples include:</p> <ul style="list-style-type: none"> -The PFS describes an initial energy audit conducted in 2012 after which the customer decided not to pursue the identified project as the pre-existing system had remaining useful life. Discussion for the project resumed in 2023, but it is unclear who initiated the discussion (PA staff, developer, or customer). -Additionally, the submitted evidence does not demonstrate the evolution of the project scope leading up to the customer’s decision to select the high-efficiency technology, and why. Several of the files labeled as “program influence” appear to be data requests from the PA or developer after the customer’s decision was made. -The PFS states cost was a driving decision factor, and the customer is targeting a 3-5 year payback. The submitted evidence does not support these claims. 	Program influence		

Note or Instruction Number:	CPUC Staff Notes or Instructions:	Instruction Category	PA Response	ED Resolution
1	<p>The PFS provides a statement that the measure is not part of a larger corporate policy and should not be considered a driver for this project. This is the second project reviewed by the CPR team for this national chain customer within the past year (refer to CPR 877). The customer, or similarly sized national customers, may be implementing this measure on a broader scale. For future similar projects the PA should more comprehensively reassess the customer's standard practice, which may be evolving as more properties receive this upgrade.</p>	Program influence		

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.