

CPUC Staff Ex Ante Review

CPUC Staff Project ID Number	SDGE_19_C_C_27	WholeBldg		
CPUC Directory Link				
PA	SDGE			
PA Application ID				
PA Application Executed Date	10/5/2018			
PA Program ID	SDGE3222			
PA Program Name	SW-COM-Calculated Incentives-Savings by Design			
PA Program Year	2018			
Date of CPUC Staff Review:	3/26/2020			
PA CMPA Upload Dates Included in this review:				
First PA Upload	10/8/2019			
Second PA Upload	11/5/2019			
Third PA Upload	2/12/2020			
PA Measure Description(s):				
Measure 1	Systems - Exterior (LED) Lighting, Whole Building Incentive			
Measure 2				
Measure 3				
Measure 4				
Measure 5				
Measure 6				
Measure 7				
Measure 8				
Measure 9				
Measure 10				
PA Project Description:	Facilities Management Department Administration Bldg			
PA Ex Ante kW Demand Reduction				
PA Ex Ante Annual kWh Impacts				
PA Ex Ante Annual Therm Impacts				
PA Proposed Incentive \$ (to Customer)	\$			
PA Proposed Total Payment to Implementer \$ (not to include the above incentive to customer)				
CPUC Staff Approved Ex Ante kW Demand Reduction				
CPUC Staff Approved Ex Ante Annual kWh Impacts				
CPUC Staff Approved Ex Ante Annual Therm Impacts				
CPUC Staff Primary Reviewer Name	Weld Fickel			
CPUC Staff Primary Reviewer Firm	Sugarpine			
CPUC Staff Review Supervisor Name	Jeremy Stapp			
CPUC Staff Review Supervisor Firm	SBW			
PA Primary Reviewer Name	NA			
PA Primary Reviewer Firm	NA			
CPUC Staff Project Manager	Peter Lai			
CPUC Staff Policy Authorization (as needed)				
CPUC Staff Recommendation Marked "X":				
x	Application ready to proceed without exception			
	Application ready to proceed with exception(s), as noted			
	Application rejected.			
	Application not ready for review, revised and resubmit as noted			
Action Number:	Summary of CPUC Staff Required Action by the PA:	Action Category	Due Date	PA Response
				CPUC Response

1	<p>The reviewer noted a number of measures that do not yield savings above code. See notes below, which includes a comprehensive list of measures identified in EnergyPro and the inspection checklist.</p> <ol style="list-style-type: none"> 1) Lighting (better than standard baseline and is modeled in EPro); 2) Mechanical Cooling is [REDACTED] unit with 12.2 EER (this is only equal to the standard baseline according to the way the Epro model is done, not better); 3) Plumbing/Domestic Hot Water is electric water heaters (NOT better than standard baseline T-24); 4) Architectural/Fenestration (the proposed window specs are NOT better than standard baseline); 5) Architectural/Insulation (both the span deck and metal roof R-values are NOT better than standard baseline); 6) Architectural/Cool Roof (the solar reflectance is better than standard baseline). <p>Please remove all measures that do not yield savings above code and revise as needed, then recheck % savings above code relative to the 10% threshold to ensure project is still eligible.</p>	Eligibility	N/A	<p>We disagree.</p> <p>CA Title 24 part 6 EE and the CA Energy Commission along with the Alt Calc Method manual allow software programs to be used to demonstrate code compliance using a "performance" based approach, where there are trade offs for building components. The energy models of the proposed designs are then compared to a set of minimally compliant building types to establish the "percent better than code".</p> <p>The SBD whole building approach follows this same holistic modeling approach of the entire building regardless of the individual components of the building.</p>	<p>To clarify, we agree that the performance approach using trade-offs which was utilized for this project was valid per code. Our concern was with the number of measures specified in the original documentation (we define a "measure" as an action that by itself has the potential to yields energy savings above the baseline). Actions that do not have the potential to yield savings cannot be claimed as measures for the purpose of meeting the minimum number of measures requirement in the SBD program. Note, SBD is designed to encourage a comprehensive approach to design, hence the multi measure / end use requirement.</p> <p>The reviewer has reviewed the additional documentation provided and agrees that the number of measures currently shown across end uses meets SBD requirements.</p>
2	<p>Based on (1) above, only two EEMs yield savings (SBD requirement is three EEMs across at least two different measure categories). At least one additional measure showing savings above code will need to be added in order for this requirement to be met. If the roof insulation measure is confirmed to be above code, that would meet this requirement.</p>	Eligibility	N/A	<p>We Disagree.</p> <p>The facility has adopted cool roof, vision glazing, VRF system efficiency, variable speed supply fans, and lowered lighting power density which exceeds the three measures across two end uses. Please review "Early_Influencec_Prelim_103018 - 20191011.pdf" for response from customer.</p>	<p>See our response to (1) above. The reviewer indicates that this requirement has been met.</p>
3	<p>The roof insulation in the Epro model and noted on the Measures Inspection Checklist is R-19 batt and R-6 rigid. That matches sheet A-A714-B System Assembly List -Roof Assembly Type1, but not General Note #4 (R-30 batt) or detail 1 on sheet A-A811-B (R-11 batt). Can you specify what batt insulation will be installed on the roof? The model may need to be revised if incorrect and this would affect project percent energy savings relative to the 10% threshold required by SBD rules. If the proposed insulation value is R-11 as shown on one of the drawings, this could potentially drop the savings below the 10% threshold and render the project ineligible. This will need to be resolved before the project can proceed.</p>	Eligibility	N/A	<p>Response was previously provided in a supplemental DR submitted (12/15/19). Attached here for reference.</p>	<p>Per the SDR response, we understand that the insulation values will be updated in the model after post-construction inspection verifies installed insulation. Given that our concerns in (1) were addressed and percent savings is currently shown at 22.3%, there is little risk of potential insulation measure changes affecting savings percentage enough to fall below the 10% threshold.</p>

Note or Instruction Number:	CPUC Staff Notes or Instructions:	Instruction Category	Due Date
1	Based on responses from the PA, disposition has been changed to proceed without exceptions.		N/A
2	Please update the bi-monthly savings values in the quarterly report to reflect the latest savings estimate.	Bi-monthly	N/A
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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. 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>
Application not ready for review, revised and resubmit as noted	The application has deficiency in the supporting documentation and the PA has provided incomplete documentation. The complete documentation has been defined in the Statewide Custom Projects Guidance Document. Please note that this is not a final recommendation from CPUC staff. This recommendation is limited to two requests per application.