

CPUC Staff Ex Ante Review

CPUC Staff Project ID Number	SDGE_20_C_C_409	Process	
CMPA Directory Link			
PA	SDGE		
PA Application ID			
PA Application Executed Date	01/08/2020		
PA Program ID	SDGE3220		
PA Program Name	3220 - SW-COM-Calculated Incentives-Calc (EEBI)		
PA Program Year	2020		
Date of CPUC Staff Review:	5/5/2020		
PA CMPA Upload Dates Included in this review:			
First PA Upload	2/19/2020		
Second PA Upload	3/24/2020		
Third PA Upload	N/A		
PA Measure Description(s):			
Measure 1	466416: Retrocommissioning - RCx (Building retro-commissioning)		
Measure 2			
Measure 3			
Measure 4			
Measure 5			
Measure 6			
Measure 7			
Measure 8			
Measure 9			
Measure 10			
PA Project Description:	RCx		
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	Dan Bertini		
CPUC Staff Primary Reviewer Firm	SBW		
CPUC Staff Review Supervisor Name	Sepideh Shahinfard		
CPUC Staff Review Supervisor Firm	SBW Consulting		
PA Primary Reviewer Name	Gibson, James		
PA Primary Reviewer Firm	SDG&E		
CPUC Staff Project Manager	Peter Lai		
CPUC Staff Policy Authorization (as needed)			
CPUC Staff Recommendation Marked "X":			
	Application ready to proceed without exception		
	Application ready to proceed with exception(s), as noted		
X	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

1	<p>The approach used to estimate initial savings are not appropriate. Submitted savings are estimated assuming savings associated with the proposed RCx measures are 10% of the total building consumption. We recommend a bottoms up engineering calculation to estimate initial savings. Additional data collection activities to collect data on existing equipment operation (e.g., hours of use, interval EMS or sub-metered data, building maintenance logs, short-term and spot measurements, functional testing results, building drawings, etc.) will be needed to inform bottom up analysis.</p>	Calculation method	within one month of this disposition
2	<p>M&V plan has limited information on how post-installations savings will be calculated. Please modify the M&V plan to explain why an Option C M&V approach is appropriate given the expected savings. Provide the revised M&V plan to cover the following areas:</p> <ol style="list-style-type: none"> 1) provide additional building characteristics and information on monitoring infrastructure that may be collected to inform M&V activities 2)The time resolution (hourly, daily, etc.) of input data and output predictions 3) The mathematical form of the model 4) Dependent variables and independent variables used to predict consumption, the logic for including and excluding specified independent variables 5) duration of pre- and post-installation data collection periods <p>Additionally, explain how the impact of non-RCx measures proposed in the audit report will be excluded from the whole building analysis.</p>	M&V plan	within one month of this disposition

Note or Instruction Number:	CPUC Staff Notes or Instructions:	Instruction Category	Due Date
1			
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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.