

CPUC Staff Ex Ante Review

CPUC Staff Project ID Number	PGE 20 C C 485 Site Specific OBF - 5094 NMEC		
CMPA Directory Link	https://deeresources.info/cmpa/projects/		
PA	PGE		
PA Application ID	Site Specific OBF - 5094		
PA Application Executed Date	0		
PA Program ID	OBFSSPGE19		
PA Program Name	On-Bill Finance (Site Specific)		
PA Program Year	1900		
Date of CPUC Staff Review:	8/11/2020		
PA CMPA Upload Dates Included in this review:			
First PA Upload	5/6/2020		
Second PA Upload	6/9/2020		
Third PA Upload	6/30/2020		
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:	0		
PA Ex Ante kW Demand Reduction	613.0		
PA Ex Ante Annual kWh Impacts	3,173,103.0		
PA Ex Ante Annual Therm Impacts	43,912.0		
PA Proposed Incentive \$ (to Customer)	\$580,218.36		
PA Proposed Total Payment to Implementer \$ (not to include the above incentive to customer)	0		
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			
CPUC Staff Primary Reviewer Firm	SBW Consulting		
CPUC Staff Review Supervisor Name			
CPUC Staff Review Supervisor Firm	SBW Consulting		
PA Primary Reviewer Name			
PA Primary Reviewer Firm			
CPUC Staff Project Manager			
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		
	Application rejected.		
	Application not ready for review, revised and resubmit as noted		
X	Advisory		
Action Number:	Summary of CPUC Staff Required Action by the PA:	Action Category	Due Date

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Note or Instruction Number:	CPUC Staff Notes or Instructions:	Instruction Category	Due Date
1	This project is submitted under the High Opportunity Programs and Projects (HOPPS) On-Bill Financing Alternative Pathway (OBF-AP) Program. Review is advisory. See notes below.	Other - advisory review	N/A
2	The actual scope of the project is not clear from the project package. We submitted an SDR asking for clarification and per PA response only the measures shown on Page 5 of the Audit Report are being implemented by the customer. These are EEMs 2, 3, 6B, 7A, and 8. This statement conflicts with what is described in the EI Page, which calls out only two EEMs (6B and 7A). Here is the list of various documentation providing conflicting information about measures: 1. Audit Report: FIVE measures including lighting, HVAC EMS, VAV kitchen ventilation, ductwork sealing, and low-flow plumbing fixture retrofits. 2. Audit Report: also indicates that a SIXTH measure is being implemented outside of the program (replacing forced-drafted cooling towers with induced-draft). 2. EI Page: TWO measures including a lighting retrofit and an HVAC EMS upgrade. 3. Executive Summary workbook: SEVEN measures including some program-ineligible non-LED lighting. Going forward, please make sure that the project documentation clearly identify final list of measures for each project and provide a clear explanation of discrepancies between various documentation. In the past, we have been using the EI page as the final source of information but for this project the EI page does not reflect the final list of measures.	Project scope unclear	N/A
3	Loan terms are not clearly identified. The maximum loan term called out in the application form is 5 years which is in contrast with the program handbook that allows a 10 year loan term. please clarify the final loan terms. Please note that if the maximum loan term is 5 years, then the project may not payback over 5 years.	eligibility	N/A
4	Modeling workbook includes individual models for 5 electric meters and 1 gas meter, whereas the M&V plan covers 7 electric meters and 1 gas meter. It looks like that the site has 6 electric meters (one of which is a fire pump) and 1 gas meter.	M&V plan	N/A
5	Project simple payback using 5 measures (2, 3, 6B, 7A and 8) barely pays back over savings-weighted EUL. Depending on the final number of measures payback may exceeds the project life. Although not an eligibility criterion, program administrators and customers should be aware that the project may not be cost effective based on energy savings alone.	Other - simple payback	N/A
6	Baseline data is from 2017. According to the Option C in the project M&V Plan, the baseline period shall be a 12 month period within the 24 month period immediately preceding the Construction Period, and the modeling workbook indicates that the construction period began in February, 2018. Depending on project completion and start of first performance period, project baseline model may need to be updated. NMEC rulebook lists a maximum 18 month construction period, which expired end of July 2019. The project package does not document the actual construction end date.	Baseline	N/A
7	The M&V plan does not state Goodness of fit (GOF) criteria or whether provided models meet those criteria. Please provide goodness of fit statistics for NMEC model per Site Level NMEC Technical Guidance. Please note that our independent analysis of the provided data using ECAM found that gas and demand savings models don't meet the GOF criteria which means Option C may not be appropriate to estimate gas and peak demand savings.	M&V plan	N/A
8	Please include a discussion in the M&V plan of how to adjust the NMEC model for energy consumption changes due to participation in another program or non-routine events.	M&V plan	N/A
9	Control costs are greater than 20% of total project cost which exceeds the cap established by the program handbook. Please review project eligibility with respect to program rules.	Eligibility	N/A
10	Buydown exceeds the 30% limit established by the program handbook. Please review project eligibility with respect to program rules.	Eligibility	N/A

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.