

Memorandum



Date: July 26, 2013

To: [REDACTED]

From: Public Utilities Commission—San Francisco - [REDACTED]

File No:

Subject: PG&E Project #: 2K12104029- [REDACTED]

The majority of the three panel reviewers, by a 2-1 margin, decided that the replacement of HVAC equipment and controls at the [REDACTED] is a normal replacement project, not an early replacement project. A normal replacement of chiller also invokes the alterations requirements of T24 that mandate installation of certain types of controls. Therefore, savings for HVAC equipment and controls that exceed the mandatory T24 requirements are eligible for savings. PG&E should resubmit savings calculations on this basis for Commission staff review. The panel was not asked to render an opinion on the occupancy sensor replacement that was previously deemed ineligible because bypassed and nonfunctional occupancy sensors were already in place at this building. Commission staff is not reconsidering its original ruling on occupancy sensor controls on the grounds of the non-regressive baseline principle.

This memorandum is the final Commission staff disposition on PG&E's appeal to the initial custom projects ex ante review findings. Commission staff will continue to review this project after PG&E resubmits its savings claim as directed above. Staff requests PG&E to explain why Utility Energy Service Contracts (UESC) program has not been included in the 13-14 PIP filing, if it is to be considered an energy efficiency program. Staff further requests PG&E to explain how the UESC program is funded and its activities that extend beyond facilitating federal energy efficiency projects.