

## CPUC Staff Ex Ante Review

CPUC Staff Project ID Number	SCE 20 C 1 565 [REDACTED]
CPMPA Directory Link	<a href="https://deeresources.info/cmpa/projects/18736">https://deeresources.info/cmpa/projects/18736</a>
PA	SCE
PA Application ID	[REDACTED]
PA Application Executed Date	2/5/2020
PA Program ID	SCE-13-SW-003D
PA Program Name	Industrial Strategic Management Program (SEM)
PA Program Year	2020
Date of CPUC Staff Review:	
PA CMPA Upload Dates Included in this review:	
First PA Upload	9/1/2020
Second PA Upload	10/6/2020
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	Whole Building behavioral, operational, and process efficiency optimization
Measure 2	
Measure 3	
Measure 4	
Measure 5	
Measure 6	
Measure 7	
Measure 8	
Measure 9	
Measure 10	
PA Project Description:	0
Bi-Monthly Upload kW Demand Reduction	[REDACTED]
Bi-Monthly Upload Annual kWh Impacts	[REDACTED]
Bi-Monthly Upload Therm Impacts	[REDACTED]
PA Proposed Incentive \$ (to Customer)	\$ [REDACTED]
Project Documentation kW Demand Reduction	[REDACTED]
Project Documentation Annual kWh Impacts	[REDACTED]
Project Documentation Annual Therm Impacts	[REDACTED]
CPUC Staff Primary Reviewer Name	[REDACTED]
CPUC Staff Primary Reviewer Firm	[REDACTED]
CPUC Staff Review Supervisor Name	[REDACTED]
CPUC Staff Review Supervisor Firm	[REDACTED]
PA Primary Reviewer Name	0.0
PA Primary Reviewer Firm	0.0
CPUC Staff Project Manager	[REDACTED]
CPUC Staff Policy Authorization (as needed)	
CPUC Staff Recommendation:	Advisory
For rejection, action required:	N/A
M&V Review:	Post M&V Review (M&V Results and Final Calculations) Required

Action Number:	Summary of CPUC Staff Required Action by the PA:	Action Category	Due Date	PA Response	ED Resolution
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1	Savings from bimonthly upload and project documentation do not match. Please investigate discrepancy.	Other 1	N/A	Per SCE/CPUC bi-weekly call on 12/3/2020 (Please refer to the meeting notes for more details), CPUC staff and SCE clarified that CPUC staff has requested "rough estimates" for the bi-monthly list with estimates of savings and incentives filled to help CPUC staff selection. During this call, CPUC staff has acknowledged that this comment doesn't apply based on our prior discussions captured in the CMPA message. SCE recommends to remove this item from the disposition	Action Item Removed
2	Building type not stated in documentation. Identify building type in project documentation package.	Missing required information	N/A	The SEM Design and M&V Guides do not mention "Building Type". None of our prior SEM documentation included this data point. A building description is provided in the Scoping Report. Can you please confirm (a) where this requirement comes from, (b) what data dictionary we should use, and (c) which documents need to include the building type going forward?	Building type is tracked by SBW CPR team and is required for claim upload to CEDARS. Suggest adding a field to the Technical Review workbook and using CEDARS standard building types found here: <a href="https://cedars.sound-data.com/cet_ui/spec/bldgtype/">https://cedars.sound-data.com/cet_ui/spec/bldgtype/</a>
3	Initial savings estimates based on █% of annual consumption. Please provide documentation supporting the █% fractional savings estimate.	Analysis assumptions	N/A	The █% number is in a section of the Scoping Report called "Targeted Savings". Note that the Scoping Report is developed before we have done any work with the site, so the percent target is not based on any documentation. No investigations or treasure hunts have been performed prior to the Scoping study. We have been using █% in all Scoping Reports to date as a placeholder. Page 63 of the Design Guide asks for the Scoping Report to include "Estimated Savings" but does not specify that any documentation is required. Choosing a target savings value of █% or more is an acceptable practice to understand how accurately the savings may be reported.	█% as a placeholder value seems high and may result in an underestimate of the upfront fractional savings uncertainty for projects using an IPMVP Option C approach. Whole facility savings fractions on the order of 3%-5% are more common for SEM projects. Note the energy savings goal for this customer was █%. Suggest tracking actual savings fractions from completed projects and updating the █% assumption as results come in.
4	Baseline model not attempted due to lack of customer specific metered data. Bottoms up calculations will be performed once the measures have been identified. Please develop an M&V plan documenting the engineering approach, engineering equations used, source of input data and site measurements used to estimate the savings.	Calculation method	At the end of year 1	The M&V Guide will be followed in documenting the bottom-up calculations. The M&V guide states that: "The effort expended to calculate energy savings for the EPIA should be less than that of incentivized custom capital project and proportional to the level of expected energy savings. M&V plans for each EPIA are not required. Energy savings calculations for EPIA shall be documented and defensible." The list of energy measures and its engineering approach to calculate savings will be documented in the Opportunity Register. Broadly, we intend to gather as much information about measures as possible, including potentially data logging larger projects, to support the savings claims. IPMVP's suggestion of allocating no more than 10% of a project's expected incentive amounts to M&V activities seems appropriate here.	Bottoms up calculations were shown in the Electricity Savings Report and HVAC Rooftop Unit Summary Electricity Savings Report Supporting Document. These meet the minimum requirements for bottoms up calculations in the CA Industrial SEM M&V Guide v2.02. Note the HVAC savings were reviewed by examining the Excel formulas. A more explicit definition of the equations would be helpful to the review team. Calculations are based on nameplate data and engineering assumptions; spot measurements of RTU fan power will reduce uncertainty of HVAC fan savings calculation parameters (power factor, percent loading) at a reasonable cost. Suggest using CA specific references for deemed parameters such as the Standard Fixture Wattage Table for lighting fixture watts. We recommend including pictures of a sample of pre & post schedules as set up in the thermostats for █ and adding pre & post pictures of the office lighting upgrade █




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"> <li>• Calculation Tool</li> <li>• Calculation Methodology</li> <li>• M&amp;V Plan</li> <li>• Baseline</li> <li>• Eligibility</li> <li>• EUL/RUL</li> <li>• Measure Type</li> <li>• Program Influence</li> </ul>
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>