

## CPUC Staff Ex Ante Review

CPUC Staff Project ID Number	SCE_20_C_1_598 [REDACTED]
CMPA Directory Link	<a href="https://deeresources.info/cmpa/projects/18882">https://deeresources.info/cmpa/projects/18882</a>
PA	SCE
PA Application ID	[REDACTED]
PA Application Executed Date	1/0/1900
PA Program ID	SCE-13-SW-003D
PA Program Name	Industrial Strategic Management Program (SEM)
PA Program Year	2020
Date of CPUC Staff Review:	1/25/2021
PA CMPA Upload Dates Included in this review:	
First PA Upload	12/1/2020
Second PA Upload	12/21/2020
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	
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	PA Response	ED Resolution
1	<p>Reviewer re-created the regression and obtained similar coefficients and model statistics. The reviewer also ran a "simplified" model where all 9 roofing types were combined in to a single variable. This variable "total roofing production" resulted in very similar model statistics [REDACTED].</p> <p>Aggregating the roofing types in to a single variable may allow greater flexibility in the event new product lines are introduced. Consider a single variable model when creating the first year performance report.</p>	Calculation method	<p>We agree that combining roofing types allows for easier future addition of new product types and have updated the model to group the product types into three shingle weights (as described by the site): light, medium, and heavy. The different weights of shingles require different amounts of energy to produce, and keeping them in three categories improves the model statistics over combining them into a single variable.</p>	<p>Three shingle weight approach looks reasonable. Note: model excluded [REDACTED] datapoint without an explanation. Please provide an explanation for removed data in future reports</p>

2	Customer has on-site power generation. Complete a non-IOU fuel analysis and submit with the first year performance report.	Self generation	The submitted package has been updated to include and account for the results of the non-IOU analysis. The previous model was not accurately accounting for times when the site was exporting electricity back to the grid. The non-IOU analysis confirmed that there were 3 days during the annualization period where the site was exporting energy back to the grid. The model and reports have been updated accordingly to properly account for these findings.	Implementer should adjust annualization calculations to exclude days where the site exports electricity to the grid. Per the M&V Guide (v2.02): "If a facility generates electricity on-site and exports excess electricity to the grid, those time periods shall be excluded from electricity savings claims." Days where there was electricity exported to the grid should be excluded from the annualization period total.
3	Reviewer notes that gas baseline model did not meet goodness of fit criteria and a implementer plans to conduct a bottoms up analysis to estimate gas savings. Once the gas measures have been identified, develop an M&V plan for the bottoms up analysis and submit along with monitored data and live calculation workbooks to support the bottoms up analysis with the first year performance report.	Calculation method	The California Industrial SEM M&V Guide v2.01 states in Section 13.1 on Page 56 in reference to energy performance improvement actions (EPIA or bottom-up) calculations that: "The evaluation shall be a check of the reasonable nature of the EPIA energy savings calculation approach, recognizing the requirements of the M&V Guide direct that a detailed M&V plan for each EPIA is not to be developed and energy savings are to be estimated with a rough order of magnitude data and calculations proportional to the expected level of energy savings." Therefore, an M&V plan has not been developed. The monitored data and live calculations were provided in the file titled "CONFIDENTIAL 10 Year 1 Gas Savings Raw Data + Savings Calculations R1."	Live bottoms up calculations were provided. We agree with the calculation approach.
4	Upfront estimate of electricity savings in bi-monthly upload was █% of annual consumption while the estimated savings in the Scoping Report was █% of annual consumption. Please examine Scoping Report before filling out bimonthly upload document and revise estimated incentive as necessary. Note, based on the baseline model goodness of fit, the fractional savings uncertainty at █% annual savings fraction is acceptable.	Other 1 - bimonthly upload savings do not match project documentation.	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	Remove action item

Note or Instruction Number:	CPUC Staff Notes or Instructions:	Instruction Category	PA Response	ED Resolution

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 before signed agreement with customer. 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>