

## CPUC Staff Ex Ante Review

CPUC Staff Project ID Number	SCE 21 C C 65 [REDACTED]
CMPA Directory Link	<a href="https://deeresources.info/cmpa/projects/19130">https://deeresources.info/cmpa/projects/19130</a>
PA	SCE
PA Application ID	[REDACTED]
PA Application Executed Date	
PA Program ID	SCE-13-SW-002B
PA Program Name	Commercial Calculated Program
PA Program Year	
Date of CPUC Staff Review:	9/17/2021
PA CMPA Upload Dates Included in this review:	
First PA Upload	7/12/2021
Second PA Upload	8/30/2021
Third PA Upload	
Fourth PA Upload	
Fifth PA Upload	
Sixth PA Upload	
Seventh PA Upload	
Eighth PA Upload	
PA Measure Description(s):	
Measure 1	(NMEC ONLY) Site-level whole building comprehensive retrofit – commercial
Measure 2	
Measure 3	
Measure 4	
Measure 5	
Measure 6	
Measure 7	
Measure 8	
Measure 9	
Measure 10	
PA Project Description:	Multi-tenant and multi-service account commercial office building proposing interior and exterior lighting retrofits, lighting controls, new DDC backbone EMS controls replacing pneumatic controls on the HVAC served by packaged RTU VAV system, and condenser coil replacement; all savings validated with NMEC approach.
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	[REDACTED]
PA Primary Reviewer Firm	[REDACTED]
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	PA Response	ED Resolution
1	<p>In response to our SDRs the PA updated peak demand savings costs and incentives. Please make sure that the next quarterly submission include updated savings values. Note that both set of savings (bi-monthly upload impacts and project documentation impacts) included in this disposition are 20% (total savings divided by the number of meters) of total savings associated with this building.</p> <p>Other savings calculation errors that need to be corrected are summarized below:</p> <p>1- We found some discrepancies in peak demand savings values estimated for lighting measures between various documents provided in response to our SDR. Please make sure that updated peak demand savings with the correct DEER peak hours are reported.</p> <p>2- It appears that the PA overestimated savings for the condensing coil measure. From the "PA Project Summary.doc" for condenser coil replacements it is assumed that new condenser coils save 5% of the kWh usage by RTUs. Assumed savings of [REDACTED] would imply that the energy usage of the RTUs is [REDACTED]. However, according to the calculations provided [REDACTED] the existing RTU requires only [REDACTED] of which only about [REDACTED] is for DX cooling and [REDACTED] is for coincident fan. Based on this estimated condenser coil savings are overestimated.</p>	Analysis assumptions		
2	The M&V Plan proposes to calculate peak demand savings based on the old definition for DEER peak hours. Please make sure that DEER demand reduction is estimated as the average demand impact across 15 hours from 4 p.m. to 9 p.m.	M&V plan		
3	In response to our SDRs the PA updated peak demand savings for the energy management system (EMS) measure but did not provide detailed calculations and explanation of what has been changed. Also updated calculation workbook still shows the original peak demand savings. Please Provide this information with your next submission.	Analysis assumptions		
4	The Option C model uses a daily "garage badge count" to track COVID impact. This seems reasonable for the daily models used to calculate energy savings. However it is not clear how this will be used for the hourly demand savings model. Please explain this in your next submission.	Analysis assumptions		

5	Lighting EUL values are estimated incorrectly. All current lighting workpapers use the EUL ID ILtg-Com-LED-50000hr which adjusts the EUL according to building hours of use and caps the EUL at 12 years.	EUL/RUL		

Note or Instruction Number:	CPUC Staff Notes or Instructions:	Instruction Category	PA Response	ED Resolution
1	Please submit the first year performance report for review at the end of the first year performance period.	Continue Document Upload		
2	For NMEC and HOPP projects the measure application type (MAT) should be the one that is not only suitable for an existing conditions baseline but also the one which accounts for the majority of the project savings. For this project that would be accelerated replacement (AR). Based on the current guidance, dual baseline calculations, RUL analysis, and preponderance of evidence (POE) are not required for NMEC projects using an AR MAT.	Measure type		

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>