

CPUC Staff Ex Ante Review

CPUC Staff Project ID Number	SCE 21 C I 697
CPMPA Directory Link	https://deeresources.info/cmpa/projects/19217
PA	SCE
PA Application ID	
PA Application Executed Date	
PA Program ID	SCE-13-SW-003D
PA Program Name	Industrial Strategic Management Program (SEM)
PA Program Year	2021
Date of CPUC Staff Review:	11/9/2021
PA CMPA Upload Dates Included in this review:	
First PA Upload	9/7/2021
Second PA Upload	9/23/2021
Third PA Upload	
Fourth PA Upload	
Fifth PA Upload	
Sixth PA Upload	
Seventh PA Upload	
Eighth PA Upload	
PA Measure Description(s):	
Measure 1	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:	Utilize differential pressure controls on dust collector baghouse pulsing; Add occupancy sensors to lighting fixtures
Bi-Monthly Upload kW Demand Reduction	
Bi-Monthly Upload Annual kWh Impacts	
Bi-Monthly Upload Therm Impacts	
PA Proposed Incentive \$ (to Customer)	
Project Documentation kW Demand Reduction	
Project Documentation Annual kWh Impacts	
Project Documentation Annual Therm Impact	
CPUC Staff Primary Reviewer Name	
CPUC Staff Primary Reviewer Firm	
CPUC Staff Review Supervisor Name	
CPUC Staff Review Supervisor Firm	
PA Primary Reviewer Name	
PA Primary Reviewer Firm	
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	The documentation does not state or note the source of weather data. In order for our independent verification of the model to be consistent please specify the weather source.	Analysis assumptions	<p>Weather data is automatically uploaded via [REDACTED]. This information is specified in Section 5 and Section 6, Table 3 of the CONFIDENTIAL 01 Energy Data Collection Plan provided. The description in section 5 is provided below</p> <p>To ensure a high-quality and gap-free feed [REDACTED] pulls weather data from an aggregation service called [REDACTED] that takes data from multiple NOAA sources, including the NOAA Integrated Surface Database, and converts the values into a regular hourly data stream for a specific location based on latitude and longitude. Their aggregation uses an advanced algorithm that pulls data from multiple surrounding weather stations, giving greater weight to those that are closer in distance or more reliable in quality, while also accounting for geographic features. The result is a data stream with better accuracy and no gaps, even when a station goes offline. However, the data stream may not match any one weather station 100 percent, especially one that has significant gaps. The weather data in Energy Sensei is available for inspection and use by regulators and authorized utility staff.</p> <p>Based on this information, SCE requests for this to not be noted as a deficiency item in the summary and for the action item to be removed from the disposition.</p>	Agree weather source was specified but please make sure the data are available to the reviewers. [REDACTED] requires a login so we were not able to download and verify the data.

2	Please provide backup documentation for the upfront engineering savings estimates for the proposed project. Also provide backup documentation for the upfront savings estimates for projects on the opportunity register.	Analysis assumptions	<p>At the Hypothesis Model stage, many projects have not been developed fully, so the project savings estimates are very rough and are there to assist with project prioritization. Many of these projects will not even be started during the Cycle. As a result, we do not expect to be able to provide more detail on calculations in the Opportunity Register supplied with the Hypothesis Model.</p> <p>Based on this information, SCE requests for this to not be noted as a deficiency item and requests to remove the action item from the disposition.</p>	<p>There is no requirement in the SEM M&V Guide to document the source of upfront engineering estimates, but providing some basis for the estimates is good engineering practice. Please list the source of the estimates in future project documentation, even if it is "engineering judgment, rule of thumb, experience with past projects etc."</p>
3	Please provide a live version of the Hypothesis Model in future submittals. This is a requirement in the Custom Project Guidance Document v1.3. We are unable to perform a thorough review of modeling methodology and adherence to the M&V plan (both in terms of the information entailed in the Hypothesis Model reports and the CA Industrial M&V Guide), with only the model inputs.	Calculation method	<p>As done in previous cohorts, [REDACTED] review spreadsheet, CONFIDENTIAL 05 Hypothesis Model Technical Review Form.xlsx, provides sufficient information for the site's Hypothesis Model. As per the requirements set forth by the SEM M&V Guide, using the information provided, an accurate least squares multiple regression can be created using a calculation tool.</p> <p>We understand the adherence is to the SEM M&V guide, not the custom process. With that being said, the live data models are provided, as well as the technical review re-creation of the models. We agree that a sheet with a live model is the best way for the evaluator to review savings. We commit to providing a live model with all future hypothesis models and savings claims. We ask that the current model review continue with the data provided in the Technical Review sheet, with the understanding that all future models and savings claims will be accompanied by a "live model" sheet.</p> <p>Based on this information, SCE requests for this to not be noted as a deficiency item. However, SCE agrees this can be an improvement item moving forward.</p>	<p>We requested submission of a live model in an SDR but agreed to review this project without a live model to expedite the review. SCE would require a live model for their due diligence and CStaff expects to have the same information for their review. Please supply a live model for all projects going forward at the hypothesis model stage and for this project when the first year performance report is submitted.</p>

Note or Instruction Number:	CPUC Staff Notes or Instructions:	Instruction Category	PA Response	ED Resolution
1	Advisory review of SEM project hypothesis model. Please provide first year savings report at the conclusion of the first year performance period	Continue Document Upload	No response required. SCE will follow the instruction.	
2	Reviewer was able to independently replicate model results:	Calculation method	No response required.	
3	SEM should be the special project description field in the bimonthly upload, not NMEC.	Other - bimonthly upload	Per the SCE_Bi Monthly EAR_2021-08-16.xlsx submission list, all SEM projects, including Project ID 697, were classified as 'SEM-BRO' under <i>Special Project Designation</i> . Based on this information, SCE requests for this to not be noted as a deficiency item in the summary and for the action item to be removed from the disposition.	Confirmed SEM-Bro special project designation Action item is removed.
	Please provide backup documentation for the upfront engineering savings estimates for the proposed project. Also provide backup documentation for the upfront savings estimates for projects on the opportunity register.	Analysis assumptions	At the Hypothesis Model stage, many projects have not been developed fully, so the project savings estimates are very rough and are there to assist with project prioritization. Many of these projects will not even be started during the Cycle. As a result, we do not expect to being able to provide more detail on calculations in the Opportunity Register supplied with the Hypothesis Model. Based on this information, SCE requests for this to not be noted as a deficiency item and requests to remove the action item from the disposition.	There is no requirement in the SEM M&V Guide to document the source of upfront engineering estimates, but providing some basis for the estimates is good engineering practice. Please list the source of the estimates in future project documentation, even if it is "engineering judgment, rule of thumb, experience with past projects etc."

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"> • 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>