

### CPUC Staff Ex Ante Review

CPUC Staff Project ID Number	SCE_21_C_1_699_ [REDACTED]
CMPA Directory Link	<a href="https://deeresources.info/cmpa/projects/19223">https://deeresources.info/cmpa/projects/19223</a>
PA	SCE
PA Application ID	[REDACTED]
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:	Lower compressed air pressure; Install lighting occupancy sensor
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	
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	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 through 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&amp;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&amp;V Guide, not the custom process. 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><b>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.</b></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.

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	
	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 being able to provide more detail on calculations in the Opportunity Register supplied with the Hypothesis Model.</p> <p><b>Based on this information, SCE requests for this to not be noted as a deficiency item and to remove the action item from the disposition.</b></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."

CPUC Staff Recommendation Definitions	
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Application ready to proceed without exception	<p>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.</p>
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>