

CPUC Staff Ex Ante Review

CPUC Staff Project ID Number	SCE 22 C C 747 [REDACTED]
CMPA Directory Link	[REDACTED]
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:	4/5/2022
PA CMPA Upload Dates Included in this review:	
First PA Upload	2/22/2022
Second PA Upload	3/9/2022
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	ME ONLY Exterior Port Lighting - accelerated replacement
Measure 2	
Measure 3	
Measure 4	
Measure 5	
Measure 6	
Measure 7	
Measure 8	
Measure 9	
Measure 10	
PA Project Description:	Retrofit the existing exterior [REDACTED] HPS fixtures with premium efficient new LED High Mast luminaires for High Mast poles The Standard Practice and calculation were approved by CPUC staff via SCEs early opinion
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]
Project Documentation Incentive \$ (to Customer)	[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	
PA Primary Reviewer Firm	
CPUC Staff Project Manager	
CPUC Staff Policy Authorization (as needed)	
CPUC Staff Recommendation:	Application ready to proceed with exception(s), as noted
For rejection, action required:	N/A
M&V Review:	Post M&V Review NOT Required

Action Number:	Summary of CPUC Staff Required Action by the PA:	Action Category	PA Response	ED Resolution
1	The PA used the installed equipment EUL to estimate the default RUL for the existing equipment. Please correct this value using 1/3 of EUL of existing equipment.	EUL/RUL		

2	<p>This project is a Full Rigor tier AR (Accelerated Replacement) project, but the project package does not provide the minimum POE (preponderance of evidence) documentation for this tier. According to E-5115, this tier requires evidence supporting age of equipment, operating data, customer's current and past repair practices, and customer current plans. The Project Feasibility Study (PFS) provides some narrative around these topics but does not provide supporting evidence. Please refer to the E-5115 for required minimum POE for this tier and provide this information for future projects.</p> <p>The same applies to the Program Influence documentation. The PFS provides some information explaining when and how the first communication with the customer was initiated but this information is not supported by additional evidence (emails, meeting notes, etc.). Key dates associated with the project development native are also not clearly documented. Going forward, please provide dates and support this information with evidence. This narrative should clearly state the timing of the customer's decision points and compare them to when the project developer interacted with the customer to validate influence. Additionally, the PFS discuss customer internal payback threshold but does not provide additional details on what this payback threshold is. Going forward, please clearly describe the customer's criteria in decision-making.</p>	Program influence		
3	<p>According to the PFS, the building type is Manufacturing - Industrial but the bi-monthly upload indicates that the project is under the Commercial sector. Please check this information and correct the sector in the next quarterly upload, if needed.</p>	Other 1		

Note or Instruction Number:	CPUC Staff Notes or Instructions:	Instruction Category	PA Response	ED Resolution
1	The High Mast LED Calculator uses a standard practice baseline of 130 lumens/Watt which was previously approved by CPUC through SCE-013 Early Opinion. If SCE is planning to continue using this tool for future projects, CPUC staff require SCE to revisit this value to make sure the correct efficacy is used based on the applicable LED fixtures available to purchase in California. A similar approach is used for the MLC. The current value of 130 lumens/watt is approved for the 2021 pipeline projects.	Baseline		
2	The High Mast LED Calculator was approved by CPUC staff via SCE-015 Early Opinion.	Calculation tool		

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>
Advisory.	The PA is not formally required to follow instructions or recommendations given in an Advisory review. However, issues found will affect ESPI scoring and may come up again in Ex-Post review.