

## CPUC Staff Ex Ante Review

CPUC Staff Project ID Number	SCE 22 P C 789
CMPA Directory Link	
PA	SCE
PA Application ID	
PA Application Executed Date	
PA Program ID	SCE-13-L-0031
PA Program Name	Public Sector Performance-Based Retrofit High Opportunity
PA Program Year	
Date of CPUC Staff Review:	8/30/2022
PA CMPA Upload Dates Included in this review:	
First PA Upload	7/18/2022
Second PA Upload	N/A
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	Public Sector HOPPs Whole Building Measure
Measure 2	
Measure 3	
Measure 4	
Measure 5	
Measure 6	
Measure 7	
Measure 8	
Measure 9	
Measure 10	
PA Project Description:	The facility will receive various upgrades involving lighting mechanical and controls The site will upgrade existing T8 linear fluorescent recessed troffers with LED equivalent retrofit kits along with upgrading the exterior perimeter lighting to LED equivalent fixtures Premium efficiency motors and VFDs will be incorporated into the -ton chiller water system to vary the chilled water loops flow CFM fan walls will replace the existing constant volume hp fans The basement equipment will be receiving a new thermostat system with a new occupancy sensor to allow for optimum startstop scheduling as needed The final measure adds a vending miser to the two vending machines onsite
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 Impacts	
Project Documentation Incentive \$ (to Customer)	
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	Please resubmit the project for our review after one full year of performance data has been collected and true-up savings are estimated.	Continue Document Upload		
2	The PA didn't properly account for HVAC interactive effects for lighting measures. According to the PA, the project is not claiming gas savings and therefore PA did not develop a billing analysis model for gas savings. For NMEC/HOPPs lighting measures, where it would not be feasible to estimate gas savings using a gas billing analysis model, the PA should use the DEER interactive effects to calculate HVAC interactive therm impacts.	Calculation method		
3	The PA failed to provide enough information to show that the proposed measures meet the minimum applicable code requirements. According to the PA, it is not necessary to include code considerations for this project since the program will ultimately measure savings (and determine incentive payments) relative to a baseline that represents the existing conditions. Although it is true that savings and incentives are calculated using existing conditions as the baseline, the PA is still required to provide enough information (e.g., equipment specs, efficiency levels, applicable code requirements) at the measure level to show that the proposed measure provide to-code or above-code savings. Please provide this information for future HOPPs and NMEC projects. For this project, please make sure all measures meet applicable code requirements, and remove measures that do not meet these requirements.	CPUC Policy		
4	The PA did not clearly discuss the scope of each measure and how measure application types (MAT) and EUL/RUL analysis were performed at the measure level. The technical review document states that the majority of savings are from Accelerate Replacement (AR) measures but does not discuss the MAT for each measure. The weighted average EUL tool includes MATs for some measures but uses a generic MAT (ROB/NC/NR) for other measures. The project feasibility study indicates that the entire project is AOE and does not provide sufficient measure level details (e.g., scope of each measure, MATs, EUL/RUL values). The PA is required to provide sufficient measure-level information (scope of each measure, MAT, EUL/RUL) for all measures included in HOPPs/NMEC whole-building projects.	Project scope unclear		
5	It is not clear whether the PA is claiming peak demand savings or not. The M&V plan states that the hourly model did not meet the goodness of fit criteria and that engineering calculations will be used to estimate peak demand savings. The engineering calculations and bi-monthly upload include peak demand savings but the technical review only includes kWh savings. For future projects, please make sure that documentation clearly identifies impacts (kW, kWh, terms) that will be included in the claim.	Missing required information		

Note or Instruction Number:	CPUC Staff Notes or Instructions:	Instruction Category	PA Response	ED Resolution
1	<p>The model baseline period used by the PA is from March 2020 through February 2021, which was the period in which the pandemic impacted the majority part of the country. This facility was closed from March 2020 through August 2020. In the M&amp;V plan, the PA states that there was no indication of the facility's operation being impacted by the pandemic and that a review of 2019 electric consumption data will be conducted to verify any pandemic related impacts. However, the PA fails to provide an explanation of why closure of the facility did not have any impact on usage and the analysis of 2019 consumption was not included in the project package. We remain skeptical that the baseline model is likely to be impacted by the pandemic and thus this model may not estimate savings accurately. It's worth to note that after reopening of the facility in August 2020, the usage pattern does not seem to be significantly different from the close-down period (March 2020 through August 2020). Given it is still unclear how the new normal operation will be different than the baseline period used by the PA, we ask the PA to provide supporting analysis to support the baseline period selection as part of future submissions of this project.</p>	Analysis assumptions		
2	The facility already have some LED fixtures installed. The project scope includes installation of additional LED fixtures.	Other 1		
3	Using the approved Modified Lighting Calculation tool could have prevented several issues associated with the lighting spreadsheet calculator that the PA used. For example, the tool that was used by the PA includes hard-coded values (e.g., wattage of baseline fixtures), does not calculate the installed fixture efficacy and does not include appropriate factors needed to calculate HVAC interactive impact and demand savings. We were unable to cross reference installed fixtures model numbers included in this tool with provided lighting specs and therefore unable to ensure that proposed fixtures meet minimum efficacy requirements.	Calculation tool		
4	Fractional Savings Uncertainty was calculated at █ % savings. Bottom-up calculations show that proposed measures save about █ % of total baseline building consumption. The PA submitted M&V plan states that the project saves █ % of total baseline building consumption. It seems like goodness-of-fit values were calculated in the R-script. Live calculation were not provided.	Analysis assumptions		

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>
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.