

CPUC Staff Ex Ante Review

CPUC Staff Project ID Number	SDGE_22_T_C_754	Process Distribution
CMPA Directory Link	[REDACTED]	
PA	SDGE	
PA Application ID	[REDACTED]	
PA Application Executed Date		
PA Program ID	SDGE4004	
PA Program Name	Comprehensive Energy Management Solutions CEMS	
PA Program Year		
Date of CPUC Staff Review:	6/21/2022	
PA CMPA Upload Dates Included in this review:		
First PA Upload	3/24/2022	
Second PA Upload	5/10/2022	
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	ProcDist - Power - Electronics - UPS	
Measure 2		
Measure 3		
Measure 4		
Measure 5		
Measure 6		
Measure 7		
Measure 8		
Measure 9		
Measure 10		
PA Project Description:	Replace existing 3 750KVA UPS units in a Mix-use Data CenterOffice Building with more efficient units	
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	Erich Ryan and Kumar Chittory	
CPUC Staff Primary Reviewer Firm	Verdant	
CPUC Staff Review Supervisor Name	Sepideh Shahinfard	
CPUC Staff Review Supervisor Firm	Quantum Energy Analytics	
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
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1	<p>The PA did not clearly explain how the standard practice baseline was developed for this customer. Given the customer has already replaced an existing 500 kVA uninterruptible power supply (UPS) system with a new UPS system with the same efficiency as what is being proposed for this project, it is not clear why the new UPS system was not considered to be the customer standard practice. We are approving this project but request the PA to clearly explain the standard practice baseline selection process for future projects.</p> <p>As part of this process, the PA should also provide all options that the customer considers functionally, technically, and economically feasible to implement, including any known options that are presently and commonly implemented. The PA did not show alternative options for this project.</p>	Baseline		
2	<p>The PA used an outdated study (2016 PG&E Data Center Baseline and Measurement and Verification Guidelines) that was never approved as an Industry Standard Practice (ISP) study and does not reflect the current practices/purchasing trends at data centers. We are approving this project but request the PA to ensure that appropriate steps are followed to develop the baseline for future projects. Please note that it's the responsibility of the PAs to examine their portfolios and identify the measures requiring an ISP studies. Given the data center market is evolving really fast, and 2022 Title 24 code has added the UPS minimum efficiency requirements (note that this was previously covered by ENERGY STAR and the 2016 PGE study stated that ENERGY STAR bar is too high), using an outdated study does not seem appropriate. We are approving this project but pointing out reasons why the PA should investigate/validate these assumptions for future projects.</p>	Baseline		
3	<p>Please make sure that final savings are normalized based on post-installation IT load to ensure service equivalency between pre- and post-installation operation.</p>	Calculation method		

Note or Instruction Number:	CPUC Staff Notes or Instructions:	Instruction Category	PA Response	ED Resolution
1	The PA did not clearly explain why the customer needs incentives to install a project that will pay back in less than a year. According to the PA, the customer has limited capital expenditures budget but at the same time, the customer has already installed similar equipment without incentives. It is not clear why this would not have been a viable project without incentives given a very short payback and customer's past experience with the proposed technology.	Program influence		
2	Payback calculations should use the applicable measure cost based on the measure application type.	Measure cost		
3	The customer initially indicated that they need on-bill financing (OBF) in addition to incentives to move forward with the project. After OBF was rejected, the customer indicated that they are okay with not receiving OBF.	Program influence		
4	Phase II of this project (CPR ID 774) involves a chiller replacement/optimization. It is not clear whether savings from this project will impact the chiller project.	Other 1		

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.