

## CPUC Staff Ex Ante Review

CPUC Staff Project ID Number	SDGE 22 T C 802 [REDACTED] Lighting
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:	10/13/2022
PA CMPA Upload Dates Included in this review:	
First PA Upload	7/29/2022
Second PA Upload	9/6/2022
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	Lighting - Exterior LED - Other - NR
Measure 2	
Measure 3	
Measure 4	
Measure 5	
Measure 6	
Measure 7	
Measure 8	
Measure 9	
Measure 10	
PA Project Description:	Parking Garage Lighting Upgrade
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	Kathleen Sturtevant
CPUC Staff Primary Reviewer Firm	DNV
CPUC Staff Review Supervisor Name	Patrick Hewlett
CPUC Staff Review Supervisor Firm	DNV
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 project cost from the vendor quote (\$ [REDACTED]) does not match the full measure cost as listed in the MLC (\$ [REDACTED]). The review team believes that this discrepancy is due to a difference in fixture count between the vendor quote (172 fixtures) and the number of fixtures used to calculate labor and miscellaneous costs per fixture (176 fixtures per cell D9 in "1751 - SP &amp; Labor Costs.xlsx"). The 172 fixture quantity is evident in the MLC; if this is the correct fixture quantity, please revise the labor and miscellaneous costs to \$ [REDACTED] and \$ [REDACTED] per fixture, respectively, so that the MLC's full measure costs align with the vendor quote.</p>	Measure cost		
2	<p>PFS page 5 notes that the customer "prefers projects with a 2 year payback or less." This project's simple payback is 1.9 years without incentives. Nonetheless, the email summary of correspondence among the customer, developer, and implementer (as supplied in response to the first SDR) indicates that the customer initially could not move forward with the project due to poor return on investment. The developer then engaged with the program implementer on incentive opportunities for the originally proposed lighting project. The technical and financial influence of the program on customer decision-making is therefore unclear. In such cases, it is imperative that the project submittal includes supporting evidence that illustrates the effect of program support and incentives in accordance with the Statewide Guidance Document Version 1.4 Appendix D Influence Job Aid. The review team was unable to verify key influence components-- e.g., who made first contact, did the project scope change as a result of program interaction-- due to lack of supporting evidence documentation in the project submittal.</p>	Program influence		
3	<p>The project is listed as normal replacement (NR) in the bi-monthly upload; please revise to accelerated replacement (AR) in the next quarterly submission.</p>	Measure type		



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.