

CPUC Staff Ex Ante Review

CPUC Staff Project ID Number	SDGE_22_T_C_819 [REDACTED] Lighting
CMPA Directory Link	[REDACTED]
PA	SDGE
PA Application ID	[REDACTED]
PA Application Executed Date	
PA Program ID	SDGE4012
PA Program Name	Federal Customer Services Program
PA Program Year	
Date of CPUC Staff Review:	12/22/2022
PA CMPA Upload Dates Included in this review:	
First PA Upload	10/19/2022
Second PA Upload	11/21/2022
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-Interior Integrated LED Retrofit - AR
Measure 2	
Measure 3	
Measure 4	
Measure 5	
Measure 6	
Measure 7	
Measure 8	
Measure 9	
Measure 10	
PA Project Description:	LED Retrofit Kits 20
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	Thor Frantz
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>Resolution E-5115 requires that all accelerated replacement (AR) projects include a signed customer affidavit that attests to the viability of the existing equipment. For Full Rigor projects, with incentives exceeding \$100,000, E-5115 (page 20) requires that the project submittal includes the signed customer affidavit as well as responses to ten questions (on pages 20-21) related to influence and preponderance of evidence: "For the Full Rigor customer incentive level tier, in addition to the Customer Affidavit Statement for equipment viability discussed in Section 4.2 in this resolution, we direct the project developer to collect information from the customer and provide a written response to the questions below to demonstrate equipment viability and program influence for the accelerated replacements measure application type." Since this project is one of several concurrent projects occurring at the same customer facility, the PA treated the project as Full Rigor (with a combined incentive greater than \$100,000) and included customer responses to the ten questions in E-5115. However, the signed customer affidavit was not included. The review team approves this project to proceed under the condition that the signed customer affidavit (in accordance with E-5115) is obtained prior to measure installation.</p>	ER preponderance of evidence		
2	<p>The incentive value reflected in the bimonthly upload (\$██████) does not match the incentive reflected in project documents such as the PFS and MLC (\$██████). Please include the correct project incentive in the next quarterly submission.</p>	Incentive calculation		

Note or Instruction Number:	CPUC Staff Notes or Instructions:	Instruction Category	PA Response	ED Resolution
1	The submitted project occurs at a federal facility. Federal buildings are subject to Federal Building Energy Efficiency Standards that may differ from other standards that inform the second-period baseline for AR lighting projects: DEER standard practice efficacies (as informed by Resolution E-5009) and California Title 24. The project documents did not appear to account for Federal Building Energy Efficiency Standards or consider if their requirements are more stringent than the standard practice efficacies embedded in MLC Version 13.1.1. Moving forward, at all facilities operated by the federal government, the PA should reference federal standards in addition to other applicable codes and standards when establishing standard-practice baselines.	Baseline		

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.