

**CPUC Staff Ex Ante Review**

CPUC Staff Project ID Number	SCE 22 T C 796
CMPA Directory Link	<a href="https://deeresources.sce.com/compa/005/005/005/">https://deeresources.sce.com/compa/005/005/005/</a>
PA	SCE
PA Application ID	
PA Application Executed Date	
PA Program ID	SCE 3P 2020RCL 005
PA Program Name	Willdan Commercial Energy Efficiency Program
PA Program Year	
Date of CPUC Staff Review:	9/27/2022
PA CMPA Upload Dates Included in this review:	
First PA Upload	7/19/2022
Second PA Upload	8/16/2022
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	MLC Only ES Downlight Retrofits - accelerated replacement
Measure 2	MLC Only Direct Linear Ambient Luminaires - accelerated replacement
Measure 3	
Measure 4	
Measure 5	
Measure 6	
Measure 7	
Measure 8	
Measure 9	
Measure 10	
PA Project Description:	It is proposed to retrofit the existing metal halides and CFLs with new LED downlights. The baseline equipment consists of metal halide fixtures along with compact fluorescent CFL fixtures located throughout the interior space. Proposed lamps are Energy Star certified LED downlights.
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:	Application ready to proceed without exception
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

Note or Instruction Number:	CPUC Staff Notes or Instructions:	Instruction Category	PA Response	ED Resolution
1	The project incentive as reflected in the bimonthly upload is [redacted]. As discussed during the biweekly meeting on 8/4/2022 please include an incentive estimate in the bimonthly data even if the incentive value is subject to change. The incentive estimate is critical for the review team when selecting projects for review and assigning review rigor. For this project please correct the incentive amount in the next quarterly submission.	Incentive calculation		
2	Per resolution E-5115 Accelerated Replacement projects with over \$25 000 incentives require medium-rigor preponderance of evidence. This includes "information on current plans or budgeting for expansion remodels replacements." The PFS and other submitted documentation did not sufficiently address this requirement.	Program influence		
3	Incremental measure cost should be supported by actual bid costs for alternative standard practice equipment that provide an equivalent level of service performance. IMC must be estimated using product pairs priced by the same or equivalent suppliers so that the calculated IMC reflects a realistic equipment cost differential. In this case the standard practice equipment costs reflect online listings and not a comparable quote from a credible vendor.	Measure cost		
4	Influence documentation notes similar projects at [redacted] other customer facilities. However the status of these other projects is unknown-- the PFS suggests that they were not pursued at the time but is dated April 2022. In future submittals please include up-to-date information on similar projects at other customer facilities where applicable as this information is relevant for program influence assessment.	Program influence		

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.

<p><b>Application ready to proceed with exception(s), as noted</b></p>	<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>▪ EUI/RUL</li> <li>▪ Measure Type</li> <li>▪ Program Influence</li> </ul>
<p><b>Application rejected.</b></p>	<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>
<p><b>Advisory.</b></p>	<p>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.</p>