

CPUC Staff Ex Ante Review

CPUC Staff Project ID Number	PGE 19 P C 292 PRI - 02113963 Prop 39
CMPA Directory Link	https://deeresources.info/cmpa/projects/16893
PA	PGE
PA Application ID	PRI - 02113963
PA Application Executed Date	43745
PA Program ID	PGE211013
PA Program Name	MEWP (DJ) - Custom Lite
PA Program Year	2019
Date of CPUC Staff Review:	7/30/2020
PA CMPA Upload Dates included in this review:	
First PA Upload	11/7/2019
Second PA Upload	11/26/2019
Third PA Upload	1/8/2020
PA Measure Description(s):	
Measure 1	Basic Linear LED T8 Replacement Lamps & Non-Dimming Retrofit Kits
Measure 2	Basic Linear LED T8 Replacement Lamps & Non-Dimming Retrofit Kits
Measure 3	Basic Linear LED T8 Replacement Lamps & Non-Dimming Retrofit Kits
Measure 4	Basic Linear LED T8 Replacement Lamps & Non-Dimming Retrofit Kits
Measure 5	Basic Linear LED T8 Replacement Lamps & Non-Dimming Retrofit Kits
Measure 6	Basic Linear LED T8 Replacement Lamps & Non-Dimming Retrofit Kits
Measure 7	Basic Linear LED T8 Replacement Lamps & Non-Dimming Retrofit Kits
Measure 8	Basic Linear LED T8 Replacement Lamps & Non-Dimming Retrofit Kits
Measure 9	Basic Linear LED T8 Replacement Lamps & Non-Dimming Retrofit Kits
Measure 10	Basic Linear LED T8 Replacement Lamps & Non-Dimming Retrofit Kits
PA Project Description:	T8s to TLEDs
PA Ex Ante kW Demand Reduction	3.4
PA Ex Ante Annual kWh Impacts	97,272.9
PA Ex Ante Annual Therm Impacts	-1,205.4
PA Proposed Incentive \$ (to Customer)	\$12,178.06
PA Proposed Total Payment to Implementer \$ (not to include the above incentive to customer)	0
CPUC Staff Approved Ex Ante kW Demand Reduction	
CPUC Staff Approved Ex Ante Annual kWh Impacts	
CPUC Staff Approved Ex Ante Annual Therm Impacts	
CPUC Staff Primary Reviewer Name	
CPUC Staff Primary Reviewer Firm	SBW Consulting
CPUC Staff Review Supervisor Name	
CPUC Staff Review Supervisor Firm	Energy 350 and SBW Consulting
PA Primary Reviewer Name	
PA Primary Reviewer Firm	
CPUC Staff Project Manager	
CPUC Staff Policy Authorization (as needed)	
CPUC Staff Recommendation Marked "X":	
	Application ready to proceed without exception
X	Application ready to proceed with exception(s), as noted
	Application rejected.
	Application not ready for review, revised and resubmit as noted

Action Number:	Summary of CPUC Staff Required Action by the PA:	Action Category	Due Date	PA Response	CPUC Staff Response
1	NOTE: This disposition has been issued as a prospective review.	N/A	N/A	N/A	N/A
2	The non-I/OU analysis needs to be corrected to follow the guideline in "EnergyEfficiency_Savings_at_Sites_with_non-I/OU_Fuel_Sources_2015-11-06.pdf" scenario 9. As submitted, the non-I/OU analysis is missing the monthly values for each of the following scenarios: 1) "no EE installed without the PV system installed" 2) "EE installed without the PV installed" and 3) "EE not installed with the PV system installed, ignoring export in monthly total use."	Non-I/OU Energy Source not Accounted For	within one month of this disposition	a. The staff of our 3rd Party implementation contractors have been unable to provide documentation complying with the more detailed hourly analysis approach because it is too complex and too time consuming to execute. b. The simplified monthly approach that we developed will always estimate less or equal grid imports than the more detailed methodology and therefore results in more conservative estimates of energy efficiency savings. c. PG&E seeks CS approval to continue using the proposed monthly approach for small lighting projects only or seeks guidance on an alternative, more easy-to-implement approach.	The revised simplified monthly approach is appropriate. Please note that monthly data analysis should only include data from 12 months prior to the measure installation. The project is currently using monthly data from January 2019 to January 2020, but it appears that the project may have been installed in the 4th quarter of 2019. Going forward, please make sure that monthly analysis does not include usage from periods that have been impacted by the measure installation. Additionally, we noticed that PG&E has updated kW, kWh and therms savings for this project in the quarterly submission (dated 3/30/2020) based on the revised simplified Non-I/OU analysis but did not update incentives based on updated savings values. Reported incentives in the quarterly submission matches the original MLC savings estimates that did not include the non-I/OU fuel analysis. Going forward, please make sure that final incentives are estimated based on final revised savings.
2	Please provide a memo supporting approval for the customer to proceed with installation prior to project approval	Project authorization	within one month of this disposition	a. The Regional SMB programs implementing the MLC approach for small lighting retrofits are not required to seek pre-approval from PG&E before beginning installation of measures. b. Customers are informed that the entire incentive is at-risk and subject to adjustment based upon the final post-installation verification true-up of the measures. c. The eligibility rules for different customer classes changed in March 2019. The latest program manual is uploaded to CMPA here: https://deeresources.info/cmpa/projects/S024	Thanks for this information. No other action is required on this.
3	Reconcile the savings between the non-I/OU analysis and the bi-monthly upload	Estimated savings do not match	within one month of this disposition	PG&E will submit the final values for this project, and all other selected projects, on an upcoming Bi-Monthly List and show the project as "previously submitted".	Was the updated project included in the bi-monthly list? If yes, did PG&E indicate that this was a resubmittal of a rejected project in the bi-monthly upload?

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Note or Instruction Number:	CPUC Staff Notes or Instructions:	Instruction Category	Due Date		
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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 a 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. 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>
Application not ready for review, revised and resubmit as noted	The application has deficiency in the supporting documentation and the PA has provided incomplete documentation. The complete documentation has been defined in the Statewide Custom Projects Guidance Document. Please note that this is not a final recommendation from CPUC staff. This recommendation is limited to two requests per application.