

Ex Ante Team Feedback on Cal TF Workpapers



CALIFORNIA
TECHNICAL FORUM

ANNETTE BEITEL
JULY 23, 2015

CPUC Feedback on Cal TF Workpapers



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- Cal TF WPs that have received CPUC feedback
 - ❑ Tier 2 APS (Res)
 - ❑ LED Surface Panels
 - ❑ LED Retrofit Kit (DI for schools)
 - ❑ VRF (Cal TF has not reviewed)
- Nature of Comments
 - ❑ Poor workpaper quality or something else?
 - ✦ Cal TF Staff Conclusion: Something else

Nature of CPUC Staff Comments



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- Incorrect statements of Commission Policy
 - CPUC VRF feedback cited outdated version of Policy Manual 3-Prong Test for Fuel Switching
- Incorrect interpretation of Commission Policy
 - CPUC VRF feedback claimed measure system design does not deliver same level of service
 - ✦ Commission definition: “Same level of service *as perceived by the customer*”
 - ✦ Measure still meets ASHRAE standards
- Incorrect application of Title 24
 - CPUC Surface Panels feedback claimed erroneous baseline
 - ✦ Workpaper used lamp assumptions that still meet code LPD and illuminance requirements

Nature of CPUC Staff Comments



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- Requests for more information
 - CPUC feedback on LED Retrofit Kits asked for “additional information and research that support the claim of early retirement”
 - ✦ Commission policy is use of “best *available* information”
- Request for more complexity
 - Commission VRF feedback asked for more granularity in the baseline heat source
 - ✦ Added value of additional granularity vs. simplifying assumption?
- Lack of clear guidance
 - Definition of EUL for Tier 2 APS EUL is still unclear
 - When it does exist, guidance is scattered across various sources (Policy Manual, dispositions, etc.)

Nature of CPUC Staff Comments



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- Not accepting broadly held professional standards and criteria in field
 - ❑ CPUC feedback on LED measures did not accept DLC as quality standard to meet Commission guidance
- Difference in subjective professional opinion
 - ❑ CPUC feedback on LED Panels disagreed on the application of lumen depreciation methodology
- Unreasonable standard for evaluating new models
 - ❑ CPUC staff is expecting that new models be validated using DOE 2.2
 - ✦ Other widely used validation tools: ASHRAE 140, field validation, EnergyPlus detailed standards

Cal TF Staff Conclusion and Solutions



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- **None of the disposition comments indicate poor workpaper quality or faults with Technical Forum review**
- Short term solutions
 - ❑ Continue with interim approval process
 - ❑ Ex ante team comments have to clearly indicate requested modifications so they can be addressed
 - ❑ Ex Ante team comments should be made during workpaper development
 - ❑ Ex ante team comments limited to single round once WP submitted
 - ❑ For discussion: How can Cal TF be involved in responding to ex ante team comments on Cal TF reviewed WP?
- Longer term solutions
 - ❑ Clear guidelines
 - ❑ CPUC participation in collaborative
 - ❑ Alternatives to DEER and DEER process