

**PUBLIC UTILITIES COMMISSION**

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Date: July 30, 2018

To: San Diego Gas & Electric Company (SDG&E)

From: Peter Lai, Commission staff

Cc: R.12-01-005 and R.13-11-005 Service Lists

Subject: Mid-year Feedback- 2018 Efficiency Savings and Performance Incentive (ESPI) Ex Ante Review

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Pursuant to Decision (D).13-09-023, D.15-10-028 and D.16-08-019, California Public Utilities Commission (Commission) staff and consultants are providing mid-year feedback on the program administrators' (PA) respective ex ante activities as of June 30, 2018. The mid-year feedback focuses on specific issues and concerns identified as part of ongoing workpaper and custom project ex ante reviews. This feedback will help the PA address these issues for the remaining year.

## **I. Commission Staff Findings 2018 Ex Ante Activities**

The following sections of this memorandum provide a description of the findings, including areas of achievement and areas requiring improvement for both custom projects and workpapers activities.

### **A. Custom Projects Review Overview**

#### **1. Summary of 2018 Mid-year Achievements**

SDG&E continues to demonstrate efforts to improve its performance. Commission staff's observations include:

- The SDG&E's program administration staff commitment to improve its internal quality assurance and quality control processes.
- SDG&E staff continues to collaborate to clarify various Commission staff guidance.
- SDG&E Engineering staff took the lead role in initiating a statewide conversation with the EnergyPro consultant and the other utilities to discuss and recommend potential solutions to address the identified software and user input issues.
- SDG&E Engineer staff took the lead role in working with another PA and the program implementer in the development of a measurement and verification plan for a customer's statewide retro-commissioning project.

#### **2. Summary of Areas Requiring Improvement**

Areas in need of improvement include similar concerns that Commission staff have highlighted in prior years. In addition, staff provides guidance on how these areas can be improved over the next six months.

- For the systematic errors in the EnergyPro™ calculation tool, SDG&E must take more care to review the results provided by the tool and not rely only on vendors or other agency's reviews to ensure the accuracy of the tool. Additionally, SDG&E should respond quickly to complying with Commission staff disposition and communicating to the program implementation staff and customers of the systematic errors.
- SDG&E should take more care to review calculation methodology and analysis approaches as discussed in Projects 0126 and X538 below.
- SDG&E should take more care in the development and review of measurement and verification plans as discussed in Projects 0125, 0126, and X421 below.

### **B. Deemed Workpapers Review Overview**

#### **1. Summary of 2018 Achievements**

SDG&E continues to demonstrate efforts to improve its performance. Commission Staff's observations

include:

- SDG&E appropriately responded to the Phase 1 disposition for LED lamps and fixtures.
- SDG&E continues to improve its efforts to keep track of other PAs' approved workpapers prior to submitting workpapers of its own that are based on those PAs' versions. This improved throughout the year.
- SDG&E continues the practice of submitting short-form workpapers based on previously approved workpapers from other PA's, which streamlines the workpaper review and approval process.

## **2. Summary of Areas of Improvement**

Commission staff encourages SDG&E to review the 2017 annual ESPI memo and continue to focus on improvements noted in that memo. Commission staff also highlights the following additional recommendations for improvement:

- When adopting another PAs' workpapers SDG&E must apply due diligence to ensure that it covers all measures included in SDG&E's programs and claims.
- Increase proactive work on appropriate baselines in workpapers for normal replacement measures and remove out-of-dated measures that have likely become standard practice or have been surpassed by more efficient technologies in the market place.

## **II. Discussion**

### **A. Custom Projects Ex Ante Review Discussion**

Commission staff issued only a few custom projects review dispositions during the first six months of 2018 and no new projects were selected during this period. Most of the custom project review activities were focused on meetings between SDG&E and Commission staff where various ongoing projects and policy issues were discussed. The Commission is in the process of selecting a new contractor to assist staff with the custom projects ex ante review and expects an increase in ex ante review activity to occur starting in the fourth quarter of 2018.

#### **1. Issues Related to Gross Savings Impacts**

In 2017 Commission staff selected two Savings by Design projects, CPUC Project ID numbers 0061 and 0127, which used the EnergyPro™ for their savings impact analysis. The ex ante review determined that the EnergyPro™ tool is flawed. It became evident that SDG&E and the Statewide team for this program had not vetted this tool before using it in this program. In January of 2018, the PAs initiated a contract with the software vendor to undertake required corrections and updates. Between February and May 2018 CPUC Staff and staff consultants and the utilities had multiple meetings to address the errors, corrections needed in the software tool and basic information on the projects impacted by these errors. However, as of June 30, 2018, of the 22 issues originally identified, seven have been adequately corrected, and six have been partially corrected. Nine remaining issues are still outstanding.

When accepting analysis tools for use in estimating savings for custom projects, PAs must take more care to review the results provided by the tool and not rely on vendor's or other agency's reviews to ensure the accuracy of the tool under the range of uses expected in the PA programs. Commission staff also note that many of the errors identified in the dispositions are user input errors in the EnergyPro™

software. User input errors are a sign that the software users may not have the expertise to perform the modelling and that the SDG&E technical reviewers may not have the expertise to review the simulation models created by the implementation teams. Additionally, SDG&E was aware in December 2017 of the errors in the Energy Pro tool and should have stopped using the tool to estimate savings for new projects and followed Commission Decision 15-10-028 Section 3.2.3.4 direction on grandfathering of impacted pipeline projects.

For CPUC ID number 0126 which is a complex HVAC project, Commission staff were disappointed that neither SDG&E nor the project implementer were able to provide a credible calculation methodology or M&V plan. Commission staff have the impression that SDG&E found the implementer's proposed M&V plan inadequate but still passed it onto Commission Staff for review. On more than one occasion this year Commission staff have explained to SDG&E that Commission Staff's role is to review SDG&E's due diligence efforts including the technical review of individual projects. Commission staff's role is not to perform the technical review for SDG&E.

For CPUC ID number 0125 which involves multiple measures at a public facility, Commission staff found that the approved M&V plan was not followed. The largest savings impact measure which involved plug load controls did not have any pre- or post-installation measurements, and the post-installation analysis was based on unverified assumptions. SDG&E must take steps to ensure M&V plans are followed and assumptions must be verified.

For CPUC ID X538, a statewide HVAC project at multiple sites and across two PA service territories of one customer, Commission Staff found that the proposed calculation methodology was flawed, with errors identified in the spreadsheet supporting the analysis. Commission Staff are disappointed that despite having two PAs reviewing this submittal, these errors were not identified.

For CPUC ID X421, an energy management project at multiple sites of one customer, Commission staff found that the post-installation analysis was flawed. Commission Staff provided input to SDG&E to expeditiously close out these projects.

## **2. Documentation Issues**

In the first six months of 2018, documentation issues were not significant. Commission Staff note that no new projects were selected for ex ante review in this timeframe and documentation issues for ongoing projects under review in this period have been previously resolved.

## **3. Issues Related to Net Impacts**

Commission staff continue to be concerned about issues related to net savings impacts. For each project, SDG&E should provide documentation that demonstrates what the customer was planning to do prior to the energy efficiency program intervened in the project. The documentation needs to demonstrate how the program enabled the customer to adopt an alternative action that improves final efficiency and provides incremental savings benefits to ratepayers over what the customer was otherwise planning to implement.

Net Impacts should be based on real and convincing evidence of program influence included in the documentation submitted for every project. The evidence of program influence should outweigh evidence that suggests the customer would have chosen the efficient alternative absent the program information or financial support. It is important that SDG&E make significant progress in reducing free ridership since as of January 1, 2018 all portfolio goals are based on net savings impacts.

#### **4. Contracting issue- Third-Party Implementer Contract Structure:**

The 2016 and 2017 ESPI memoranda noted several issues with third party contracts including some projects that seemed to have unexpectedly large performance payment rates, a lack of meaningful third-party performance payment caps, and a contract structure based solely on first year claimed gross savings impacts with no consideration for net impacts. Pursuit of large performance payments can create an environment in which implementers maximize the ex ante savings estimates at the expense of compliance with Commission policy, appropriate and accurate assessment of program influence, measure eligibility or classification and savings impacts. The upcoming third-party contract solicitation must address these issues.

#### **5. Potential Reviewer-Program Implementer Conflicts of Interest Issue:**

Commission staff understands that SDG&E currently does not generally rely on third party technical reviewers and third-party implementers for custom projects. However, as the implementation work shifts to third-parties a directed by the Commission, Commission staff have concern that some third-party implementer firms also perform technical review of program applications. Commission staff believes, that a conflict of interest may exist for several technical review contractors that are also third-party implementers for other PA's. While Commission staff understand that implementers do not in most cases review projects that their firm is also implementing, there is an inherent conflict related to being on the both the enforcement and user side of rules and policies that has contributed to the lack of progress on many of the issues discussed above. Commission Staff expect this issue to be resolved on a statewide basis and require SDG&E to be a party to the solution.

### **B. Deemed Workpapers Ex Ante Review Discussion**

SDG&E's deemed program continued at a similar pace to previous years. The deemed ex ante review included three Phase 1 workpapers which were included in dispositions published on March 1<sup>st</sup>, 2018. Additionally, two Phase 2 workpaper were reviewed. SDG&E relies heavily on the workpaper development efforts of other PAs. Therefore, observations and recommendations are influenced by the level of due diligence SDG&E has applied in the adoption of work done by others. Adopting work from other PAs is on one hand a positive step; however, SDG&E should ensure they are not submitting short form workpapers for which the lead workpaper has not been approved and that it includes measures SDG&E is offering. The comments below are organized by the 5 metric areas of scoring. A table of all submitted and reviewed workpapers, along with ESPI scoring of each reviewed workpaper is included in Attachment A **Error! Reference source not found.**

#### **1. Timeliness**

SDG&E resubmitted workpapers for deemed LED measures in a timely fashion once final interim values developed in collaboration with PG&E.

However, Commission staff was expecting updates of workpapers for the 2018 Phase 1 review period. SDG&E did not submit any revised LED workpapers for Phase 1 even though PAs have been directed to update these workpapers to include revised standard practice baselines. Another example is residential and small commercial water heaters. Federal regulations require residential and small commercial water heaters to be rated under a revised testing and reporting standard as of December 2017. Commission staff was expecting revised workpapers to be submitted as part of Phase 1 that reflected these code changes. Instead, Commission staff had to issue a uniform disposition covering all PAs' water heating

workpapers, regardless of whether revisions were submitted as part of Phase 1.

. PAs are responsible for updating workpapers for code changes and where changes in DEER would cause changes in non-DEER measures. PAs with SCE as the lead, have been submitting a consolidated workpaper plan that includes, for a subset of currently active workpapers, the workpaper-lead PA and anticipated submission dates of revisions. At this time, this workpaper plan contains little information about the underlying reasons for updating workpapers or carrying them over into an upcoming program year without revisions. This makes it difficult for Commission staff to form a complete picture of the timeliness of SDG&E's Phase 1 submissions. Commission staff recommends adding a brief analysis to the consolidated workpaper plan that summarizes for each workpaper any code changes, previous direction from Commission staff, resolutions or Commission decisions, DEER revisions and EM&V findings that would necessitate Phase 1 workpaper revisions.

## **2. Content, Completeness, and Quality of Submissions**

SDG&E is meeting expectations in some programs areas. Expectations were met within the lighting programs and SDG&E's workpaper submission followed direction for the Phase 1 disposition on screw-in lamps. Additionally, SDG&E submits many "short form" workpapers which reference other PA's workpapers but describe how these measures will be incorporated into SDG&E's programs. Commission staff generally consider SDG&E's submissions of short form workpapers as positive. Commission staff noted in the 2017 annual ESPI memo that SDG&E should ensure they are not submitting short form workpapers for which the lead workpaper has not been approved, such as with WPSDGEREWP0002 for variable speed pool pumps. SDG&E should work to improve submission for other program areas to meet similar quality of content standards as they have achieved in these lighting submissions.

## **3. Proactive Initiative of Collaboration**

Other than regularly scheduled, bi-weekly meetings, Commission staff has not had any collaborations on specific workpapers with SDG&E.

## **4. PA's Due Diligence, Quality Assurance, and Quality Control**

Commission staff observes some examples where SDG&E could improve its performance in this metric, mostly in its efforts to develop short form workpapers that adopt workpapers by other PAs. For example, SDG&E did not submit LED screw-in lamp or exterior lighting workpapers for Phase 1 review of this year's cycle. Instead, SDG&E submitted short form workpapers based on PG&E's approved workpapers. However, SDG&E's older workpaper (for which they did not submit a revision) included measures that were not included in PG&E's workpaper. Instead of submitting revised workpapers that adopted and supplemented PG&E's workpaper, SDG&E requested to Commission staff add these measures without a workpaper being submitted. Commission staff notes that new measures are required to be submitted with a workpaper. In this case Commission staff accommodated SDG&E's request for screw-in lamp additions as those changes were simple and required no additional analysis. However, staff did not accommodate SDG&E's request for the addition of multi-family exterior lighting measures and directed SDG&E to complete additional analysis and submit a workpaper. SDG&E should be engaged with lead workpaper developers well in advance of submission so that SDG&E specific measures can either be incorporated into the lead workpaper or into an SDG&E specific workpaper, submitted in a timely manner.

## **5. PA's Responsiveness**

So far in 2018, SDG&E has been more responsive in submitting workpapers (typically short form

adoptions of lead workpapers developed by other PAs) in time for inclusion in programs. As with the 2017 memorandums, Commission staff encourages SDG&E to examine its entire catalog of deemed offerings to ensure that normal replacement measures are properly updated considering the likely replacement technology when a user decides to replace that technology, equipment or system outside of any PA efficiency program are not the very least efficient equipment that could legally be installed as the baseline. Commission staff encourages SDG&E to revise their deemed savings programs to remove out-of-date and standard technologies. Commission staff is concerned that SDG&E is still offering incentives for CFLs<sup>1</sup> and linear fluorescent technologies even as the Commission's Goals and Potential Study have removed or greatly reduced these measures for 2018 and beyond

[Attachment A](#) contains the workpaper summary tables showing the qualitative components for each metric. Each reviewed workpaper was first determined to have components either applicable or not applicable to a metric. If an item was determined to have activity applicable to a metric, the item was then assigned a qualitative rating as to the level of due diligence applied to the item as either deficient (or "-"), apparent but minimal (or "yes"), or superior (or "+").

Questions or comments about the feedback or final scores should be directed to Peter Lai ([peter.lai@cpuc.ca.gov](mailto:peter.lai@cpuc.ca.gov)). Note that pursuant to D.13-09-023, Commission staff will schedule a conference call with SDG&E staff to discuss and answer clarifying questions of this memorandum.

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<sup>1</sup> D18-05-041 at 19 "Several evaluation studies have shown that the energy savings are diminishing, customer acceptance is lower, and continued funding of CFL incentives may actually delay the adoption of preferable light-emitting diode (LED) technologies. In addition, the potential and goals study addressed in D.17-09-025 does not assume that CFL measures were part of the energy savings potential upon which the goals were based. Therefore, we will require the PAs to take action to end incentives for CFLs of all types and to comply with Commission staff guidance on updating workpapers to reflect accurate savings. CFL incentives should be removed from all portfolios by no later than December 31, 2018."

OP 5: "Program administrators shall discontinue payment of incentives as part of the business plan energy efficiency program for compact fluorescent lighting no later than December 31, 2018. This prohibition shall also be reflected in the implementation plans, as well as in the annual budget advice letter filing for 2019."

## Attachment A: Workpaper Feedback

The table below lists the ID numbers associated with each workpaper submission or disposition and the workpaper review process “score enhancements” scoring area. The listed weight is used in the combining all the individual rows together into a single score for all the rows in the two scoring components (“direct review” and “process issues”); then each category total score gets equal weighting in the final total score for the metric. The PA may refer to the individual dispositions for more detailed descriptions of the specific actions staff required for each workpaper. The qualitative ESPI scoring feedbacks are designated as follows:

- ‘+’ indicates a positive (from midpoint) scoring impact on a metric,
- ‘-’ indicates a negative (from midpoint) scoring impact on a metric,
- ‘Yes’ indicates meeting expectation; neutral (midpoint) scoring impact on a metric,
- ‘No’ indicates the review feedback is not applicable to a metric.

Workpaper Detailed Reviews				ESPI Metrics					
WP ID	Rev	Title	Comments	Weight	1	2	3	4	5
WPSDGENRLG0181	4	LED Outdoor Area and Street Lighting	Positive: SDGE submitted workpaper a new short form workpaper adopting PG&E's approved workpaper in place of this workpaper. Opportunities: CPUC staff was expecting and update to this workpaper to reflect previous direction to update ISP. In February 2017, CPUC staff issued a custom project disposition that directed SCE to collaborate with other PAs and complete and ISP study for interior and exterior lighting by October 1, 2017 (in time to incorporate results into 2018 deemed and custom savings values). At this time, SCE is still in the planning stages and expects to complete the work by the fall of 2018 (about a year later than directed). Some of the delay appears to be due to an increase in scope to investigate current existing conditions (which would serve as a first baseline only in AR claims).	-	no	no	-	-	
WPSDGENRLG0198	0	Exterior LED Sports & Athletic Field Lighting Fixtures	See comment for WPSDGENRLG0181	-	no	no	-	-	
WPSDGENRWH1206	1	Instantaneous WH for Commercial Applications	Opportunities: Starting 2018, residential and small commercial water heaters are required by Federal standards to be tested and rated with an Uniform Energy Factor (UEF). However, it appears that all IOU programs are still defining measures using the outdated Energy Factor (EF). As part of the Phase 1 disposition, CPUC staff developed measure definitions using UEF, but no workpapers have been submitted following this direction.	-	no	no	no	no	
WPSDGEREWH0024	0	StorageTank WH	See comment for WPSDGENRWH1206	-	no	no	no	no	



Workpaper Detailed Reviews				ESPI Metrics					
WP ID	Rev	Title	Comments	Weight	1	2	3	4	5
WPSDGENRLG0106	5	SF Integral LED Lamps	Positive: SDGE submitted a workpaper based on PG&E's final workpapers in a timely manner. Opportunities: Initial 2018 submissions did not consider that Title 20 requirements would generally prohibit the sale of incandescent A-lamps and MR-16 lamps in California on 1/1/2018.		-	no	no	no	no

Workpaper Submissions				ESPI Metrics					
WP ID	Rev	Title	Submission Status: EAR Team Comments	Weight	1	2	3	4	5
WPSDGENRLG0198	0	Exterior LED Sports & Athletic Field Lighting Fixtures	Detailed review – resubmit - scored in detailed review section		no	no	no	no	no
WPSDGENRLG0106	5	MR16, PAR30, PAR38 and A-Type LED Lamps Retrofit	Detailed review – resubmit - scored in detailed review section		no	no	no	no	no
WPSDGENRPR0004	1	Process Fan VSD	Review waived - interim approval		no	no	no	no	no
WPSDGENRLG0028	1	LED Pool and Spa Lighting	Review waived - interim approval		no	no	no	no	no
WPSDGENRRN0016	0	High Efficiency Ultra-Low Temperature Freezers	Review waived - interim approval		no	no	no	no	no
WPSDGEREHC0031	0	SF Direct Evaporative Coolers	Review waived - interim approval		no	no	no	no	no
WPSDGEREMIO006	0	Window Retrofit	Review waived - interim approval		no	no	no	no	no
WPSDGEREWH0023	0	Central System Natural Gas Water Heater for Multi-Family	Review waived - interim approval		+	no	no	no	no
WPSDGEREWH0022	2	Residential Heat Pump Water Heater	Review waived - interim approval for 2017 but should have been resubmitted for 2018 to consider standards change to UEF		-	no	no	no	no
WPSDGEREMIO006	0	Window Retrofit	Review waived - interim approval		no	no	no	no	no
WPSDGENRLG0083	0.1	LED Ambient Commercial Fixtures and Retrofit Kits	Review waived - interim approval for 2017 only		no	no	no	no	no
WPSDGEREWH1061A	5	Low Flow Showerhead	Review waived - interim approval		no	no	no	no	no
WPSDGERERN001	2	Res Condenser Coil Cleaning	Review waived - interim approval		no	no	no	no	no
WPSDGEREHC1064	1	Quality Installation Res Split Pkg Units	Review waived - interim approval		no	no	no	no	no
WPSDGEREWH0024	0	Storage Tank Water Heaters	Review waived - interim approval for 2017 but should have been resubmitted for 2018 to consider standards change to UEF		-	no	no	no	no
WPSDGEREHC1063	0	Residential High Efficiency Furnaces	Review waived - interim approval		no	no	no	no	no
WPSDGEREHC1066	0	Attic Insulation	Review waived - interim approval		+	no	no	no	no
WPSDGEREWH0011	4	Energy Star Clothes Washer	Review waived - interim approval		+	no	no	no	no

Workpaper Submissions				ESPI Metrics					
WP ID	Rev	Title	Submission Status: EAR Team Comments	Weight	1	2	3	4	5
WPSDGEREWH1062	0	Water Saving Kit	Review waived - interim approval		+	no	no	no	no
WPSDGEREHC0032	0	Res Refrigerant Charge	Review waived - interim approval		+	no	no	no	no
WPSDGEREHC1067	0	Duct Seal	Review waived - interim approval		+	no	no	no	no
WPSDGERELG1057	1	Residential Outdoor Landscape LED Fixtures (Pathways & Floodlights)	Detailed review – resubmit - scored in detailed review section						
WPSDGERERN001	3	Residential Single Family and Multi-Family Condenser Coil Cleaning	Review waived - interim approval		+	no	no	no	no
WPSDGEREWH1012	2	Faucet Aerators for Bathroom/Kitchen Sinks in Residential Buildings	Review waived - interim approval		+	no	no	no	no
WPSDGEREWP0002	7	Variable Speed Pool Pump	Detailed review – resubmit						
WPSDGENRCC0004	4	Commercial Ice Machines	Review waived - interim approval		+	no	no	no	no
WPSDGENRLG0083	1	LED Ambient Commercial Fixtures and Retrofit Kits	Review waived - interim approval but very late submission given preliminary review was issued in 2017		-	no	no	no	no
WPSDGENRLG0181	4	LED Outdoor Area and Street Lighting	Detailed review – resubmit - scored in detailed review section						
WPSDGENRWH0014	0	Low Flow Aerator for Non-Residential	Review waived - interim approval		+	no	no	no	no
WPSDGENRWH0015	0	Low Flow Aerator for Hospital and Healthcare	Review waived - interim approval		+	no	no	no	no
WPSDGENRH0023	2	Commercial Air-cooled Unitary Air Conditioners and Heat Pumps <65 kBtu/h	Review waived - interim approval		+	no	no	no	no
WPSDGENRH0025	0	Commercial Air-cooled Unitary Air Conditioners and Heat Pumps >=65 kBtu/h	Review waived - interim approval		+	no	no	no	no
WPSDGENRWH1206	1	Instantaneous WH for Commercial Applications	Detailed review – resubmit - scored in detailed review section						
WPSDGEREWH0023	0.1	Central System NG Boilers MF	Review waived – Interim approval		+	no	no	no	no
WPSDGEREHC0032	0.1	SF Res Refrigerant Charge	Review waived – Interim approval		+	no	no	no	no
WPSDGERERN001	3.1	Residential Single Family and Multi-Family Condenser Coil Cleaning	Review waived – Interim approval		+	no	no	no	no
WPSDGEREHC1065	3	Residential HVAC Quality Maintenance and Motor Retrofit	Review waived – Interim approval		+	no	no	no	no
WPSDGEREHC0030	0.1	Residential Smart Thermostats	Review waived – Interim approval		+	no	no	no	no
WPSDGENRH01052	0	High Efficiency Package Terminal	Review waived – Interim approval		+	no	no	no	no

Workpaper Submissions				ESPI Metrics					
WP ID	Rev	Title	Submission Status: EAR Team Comments	Weight	1	2	3	4	5
WPSDGENRRN0017	0	Refrigeration Floating Suction and Head Pressure Controls	Review waived – Interim approval		+	no	no	no	no
WPSDGENRCC0015	1	Commercial Combination Ovens-Gas and Electric	Review waived – Interim approval		+	no	no	no	no
WPSDGEREWH0025	0	Residential High Efficiency Instantaneous Water Heater	Review waived - interim approval for 2017 but should have been resubmitted for 2018 to consider standards change to UEF		-	no	no	no	no
WPSDGENRCC0018	1	Commercial Combination Ovens-Gas and Electric	Review waived – Interim approval		+	no	no	no	no
WPSDGENRLG0107	0	SF_Recessed Downlight Retrofit Kit	Review waived – Interim approval		+	no	no	no	no
WPSDGENRLG0106	6	SF_Integral LED Lamps	Review waived – Interim approval		+	no	no	no	no
WPSDGENRLG0080	4	LED High-Bay and Low-Bay Fixtures	Review waived – Interim approval		+	no	no	no	no
WPSDGENRLG0181	5	LED_Outdoor Area and Street Lighting	Review waived – Interim approval		+	no	no	no	no
WPSDGENRLG0107	0	SF_Recessed Downlight Retrofit Kit	Review waived – Interim approval		+	no	no	no	no