CPUC Staff Ex Ante Review

CPUC Staff Project ID Number	SCE_20_C_I_610 [redacted]
CMPA Directory Link	https://deeresources.info/cmpa/projects/18991
PA	SCE
PA Application ID	[redacted]
PA Application Executed Date	
PA Program ID	SCE-13-TP-022
PA Program Name	Water Infrastructure and Systems Efficiency
PA Program Year	
Date of CPUC Staff Review:	9/23/2023
PA CMPA Upload Dates Included in this review:	
First PA Upload	1/19/2021
Second PA Upload	2/2/2021
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	Ammonia based controls on wastewater blower - new
Measure 2	Wastewater controls - add-on equipment
Measure 3	
Measure 4	
Measure 5	
Measure 6	
Measure 7	
Measure 8	
Measure 9	
Measure 10	
PA Project Description:	[redacted]
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]
CPUC Staff Primary Reviewer Name	[redacted]
CPUC Staff Primary Reviewer Firm	[redacted]
CPUC Staff Review Supervisor Name	[redacted]
CPUC Staff Review Supervisor Firm	[redacted]
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 (M&V Results and Final Calculations) Required

Action Number:	Summary of CPUC Staff Required Action by the PA:	Action Category	PA Response	CPUC staff Resolution
1	Please provide updated project documentation at post M&V for review.	Measure type	Post-installation package provided on 7/27/2023.	The following summarizes our review findings for the post-installation review, which focused on the calculation approach: For EEM1 (NEW – Enhanced Aeration Controls), the calculated savings are based on the installation of an ammonia-based aeration control system, which is expected to result in additional blower savings beyond the standard practice aeration control (i.e., automatic DO control). However, these savings are determined by simply reducing the average dissolved oxygen (DO) level from [redacted] to [redacted]. The baseline DO level of [redacted] is calculated using baseline data that did not have any automated DO control. This approach results in an overestimation of savings. Furthermore, the project documentation did not explain whether permitted ammonia limits for the facility have changed or tightened and whether this has any bearing on the project scope. Similarly, for EEM1 (AOE – Enhanced Aeration Controls), the calculated savings involve the addition of an ammonia-based control system to [redacted] aeration units that already have a DO setpoint of [redacted] and blowers equipped with variable frequency drives (VFDs). The calculations, however, are based on reducing the DO level from a constant [redacted] to [redacted]. The documentation does not clarify how this constant baseline value was established or why an aeration control system with a DO setpoint of [redacted] and VFD-equipped blowers would not modulate flow based on the DO setpoint. The savings estimation for this measure, like the previous one, lacks sufficient support. It is also unclear why these measures did not utilize actual SCFM (Standard Cubic Feet per Minute) measurements and relied on modeled measurements when actual data was available. According to SCE, due to the considerable time gap between project implementation ([redacted]), completion of the post-installation review ([redacted]), and submission of this project for CPUC review ([redacted]), SCE will not be claiming savings from this project. We do not wish to further review this project.

Note or Instruction Number:	CPUC Staff Notes or Instructions:	Instruction Category	PA Response	CPUC staff Resolution
1	After discussion between CS and SCE, we agree the correct MAT for the new blower portion of this measure is NC with a measure EUL of [redacted]			

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	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. 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. The following areas will not be reviewed again by CPUC Staff: • Calculation Tool • Calculation Methodology • M&V Plan • Baseline • Eligibility • EUL/RUL • Measure Type • Program Influence
Application rejected.	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. 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)