

## CPUC Staff Ex Ante Review

CPUC Staff Project ID Number	PGE 20 T I 580 PRJ - 02476684 Process
CMPA Directory Link	<a href="https://deeresources.info/cmpa/projects/18809">https://deeresources.info/cmpa/projects/18809</a>
PA	PGE
PA Application ID	PRJ - 02476684
PA Application Executed Date	
PA Program ID	PGE21027
PA Program Name	Heavy Industry Energy Efficiency Program - Customized Retrofit
PA Program Year	
Date of CPUC Staff Review:	12/1/2020
PA CMPA Upload Dates Included in this review:	
First PA Upload	10/20/2020
Second PA Upload	N/A
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	PROCESS RETROFIT/NEW-WASTE WATER-AERATORS-EFFICIENT UNIT
Measure 2	
Measure 3	
Measure 4	
Measure 5	
Measure 6	
Measure 7	
Measure 8	
Measure 9	
Measure 10	
PA Project Description:	0
Bi-Monthly Upload kW Demand Reduction	59.7
Bi-Monthly Upload Annual kWh Impacts	648,641.0
Bi-Monthly Upload Therm Impacts	0.0
PA Proposed Incentive \$ (to Customer)	\$86,794.92
Project Documentation kW Demand Reduction	59.7
Project Documentation Annual kWh Impacts	648,641.0
Project Documentation Annual Therm Impacts	0.0
CPUC Staff Primary Reviewer Name	
CPUC Staff Primary Reviewer Firm	Energy 350
CPUC Staff Review Supervisor Name	
CPUC Staff Review Supervisor Firm	SBW Consulting
PA Primary Reviewer Name	
PA Primary Reviewer Firm	
CPUC Staff Project Manager	
CPUC Staff Policy Authorization (as needed)	
CPUC Staff Recommendation:	Application rejected.
For rejection, action required:	Complete Resubmittal Required (SB1131 timeline reset)
M&V Review:	Post M&V Review NOT Required

Action Number:	Summary of CPUC Staff Required Action by the PA:	Action Category	Due Date	PA Response	ED Resolution
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1	<p>We don't agree with the standard practice study conclusion. The project developer conducted a custom standard practice study (interviewed with 1 design engineer, 2 vendors, and 1 customer) and concluded that brush aerators without automatic Dissolved Oxygen (DO) control are standard practice for wineries. We do not agree with the conclusion of this study for the following reasons:</p> <p>1) the questionnaire did not clearly ask about the standard practice control strategy for brush aerators, blowers and pumps to identify whether DO control and VFDs are standard practice. The project assumed no DO control for baseline brush aerators, and no VFD for influent/effluent pumps.</p> <p>2) Interviewees included a vendor that only sells brush aerators and can not offer other technologies (e.g., blowers, turbo blowers). Also, this interviewee indicated that timers are common for controlling brush aerators but this control strategy was not considered in calculations.</p> <p>3) One of the vendors indicated that DO control is becoming more common (75% of purchases include this option) but this was not considered in calculations.</p> <p>Please note that the customer considered both surface aerators and submerged diffusion as standard practice options.</p>	Baseline			
2	<p>From the program influence documentation, it appears that the customer was already planning to install high efficiency blowers and it is not clear how the program influenced this decision.</p>	Program influence			
3	<p>The technical reviewer indicated that VFDs are standard practice for WWTP influent/effluent pumps but calculations does not include this option in the baseline operation of the pumps. Also, the assumption about minimum number of brush aerators running all the time is not properly supported.</p>	Calculation method			



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. <u>There will not be conditional approval.</u>
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"> <li>• Calculation Tool</li> <li>• Calculation Methodology</li> <li>• M&amp;V Plan</li> <li>• Baseline</li> <li>• Eligibility</li> <li>• EUL/RUL</li> <li>• Measure Type</li> <li>• Program Influence</li> </ul>
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>