

CPUC Staff Ex Ante Review

CPUC Staff Project ID Number	PGE_22_T_C_783_PRJ - 03253058_Recreate
CMPA Directory Link	https://deeresources.info/cmpa/projects/20423
PA	PGE
PA Application ID	PRJ - 03253058
PA Application Executed Date	
PA Program ID	PGE Pub 009
PA Program Name	Willdan Public sector - Customized Retrofit
PA Program Year	
Date of CPUC Staff Review:	9/13/2022
PA CMPA Upload Dates Included in this review:	
First PA Upload	6/14/2022
Second PA Upload	7/12/2022
Third PA Upload	8/2/2022
Fourth PA Upload	
Fifth PA Upload	
Sixth PA Upload	
Seventh PA Upload	
Eighth PA Upload	
PA Measure Description(s):	
Measure 1	POOLS RETROFITNEW-OTHER
Measure 2	
Measure 3	
Measure 4	
Measure 5	
Measure 6	
Measure 7	
Measure 8	
Measure 9	
Measure 10	
PA Project Description:	This energy efficiency measure will install electric air-source heat pumps as the primary heating system for the City's community swimming pool replacing the existing gas-fired pool heater currently in use as the primary heating source for the pool
Bi-Monthly Upload kW Demand Reduction	0.0
Bi-Monthly Upload Annual kWh Impacts	-172,766.0
Bi-Monthly Upload Therm Impacts	33,506.0
PA Proposed Incentive \$ (to Customer)	\$285,000.00
Project Documentation kW Demand Reduction	0.0
Project Documentation Annual kWh Impacts	-172,766.0
Project Documentation Annual Therm Impacts	33,506.0
Project Documentation Incentive \$ (to Customer)	285,000.0
CPUC Staff Primary Reviewer Name	
CPUC Staff Primary Reviewer Firm	Verdant
CPUC Staff Review Supervisor Name	
CPUC Staff Review Supervisor Firm	Quantum Energy Analytics
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	PA Response	ED Resolution
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1	<p>According to the CPUC resolution E-5115, proposed equipment choices that are selected under a normal replacement case must meet the anticipated functional, technical, and economic needs of the customer. In this project, the proposed heat pump pool heaters fail to meet the customer functional needs (i.e., heating the pool to the desired temperature year-round). A supplemental gas heater or electric pool heaters are needed to meet the customer functional needs during colder temperatures. Instead of proposing a new system that meets the customer functional needs, the PA plans to retain the existing 23-year-old gas heater—while claiming normal replacement of the existing gas heater—to meet the functional needs of the customer. According to the Statewide Custom Guidance Document, retaining and operating existing equipment in conjunction with the new equipment to meet the customer functional needs is not appropriate (note that the gas heater is not being retained as a back up and, in fact, it will be needed as part of the main system to provide the level of service required by the customer). Please note that in the case of the normal replacement, it is assumed that the new/proposed equipment will continue to operate for the full life of the measure. An existing 23-year-old inefficient gas heater cannot continue to operate for the full life of the measure.</p> <p>The project can be resubmitted with a measure case that meets the customer functional needs.</p>	CPUC Policy		

Note or Instruction Number:	CPUC Staff Notes or Instructions:	Instruction Category	PA Response	ED Resolution
1	<p>The incremental measure cost (IMC) calculations does not seem appropriate as the measure case includes a code-compliant gas heater to meet the customer functional needs, but the cost associated with code-compliant gas heater is not included in the measure case cost. It also appears that costs not related to the EE project are included in the IMC calculations. The provided cost quotes are from the project implementor.</p> <p>The appropriateness of the cost calculations should be reviewed if this project is resubmitted.</p>	Measure cost		

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	<p>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.</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>
Advisory.	The PA is not formally required to follow instructions or recommendations given in an Advisory review. However, issues found will affect ESPI scoring and may come up again in Ex-Post review.