

CPUC Staff Ex Ante Review

CPUC Staff Project ID Number	PGE 22 T C 812 PRJ - 02972592 Process Distribution
CMPA Directory Link	https://deeresources.info/cmpa/projects/20556
PA	PGE
PA Application ID	PRJ - 02972592
PA Application Executed Date	
PA Program ID	PGE Pub 010
PA Program Name	AESC - RAPIDS - Water Wastewater Optimization
PA Program Year	
Date of CPUC Staff Review:	10/25/2022
PA CMPA Upload Dates Included in this review:	
First PA Upload	9/13/2022
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 RETROFITNEW-PUMPS-REPLACE
Measure 2	
Measure 3	
Measure 4	
Measure 5	
Measure 6	
Measure 7	
Measure 8	
Measure 9	
Measure 10	
PA Project Description:	This application entails the Accelerated Replacement of existing Return Activated Sludge RAS and Waste Activated Sludge WAS pumps at the wastewater treatment plant in climate zone 3
Bi-Monthly Upload kW Demand Reduction	26.9
Bi-Monthly Upload Annual kWh Impacts	285,946.2
Bi-Monthly Upload Therm Impacts	0.0
PA Proposed Incentive \$ (to Customer)	\$38,341.04
Project Documentation kW Demand Reduction	26.9
Project Documentation Annual kWh Impacts	285,946.0
Project Documentation Annual Therm Impacts	0.0
Project Documentation Incentive \$ (to Customer)	38,341.0
CPUC Staff Primary Reviewer Name	
CPUC Staff Primary Reviewer Firm	DNV
CPUC Staff Review Supervisor Name	
CPUC Staff Review Supervisor Firm	DNV
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 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>The savings calculations for the accelerated replacement (AR) of return activated sludge (RAS) and waste activated sludge (WAS) pump motors reflect a standard practice baseline of NEMA Standard Efficiency motors. The PA technical reviewer noted in the pre-install technical review document that they "are not aware of any published study for this type of Wastewater pumping" and confirmed the second-period baseline to reflect customer standard practice of NEMA Standard Efficiency motors. Please revise the measure's second-period baseline to reflect NEMA Premium Efficiency motors as stipulated in 2015's "Energy Baseline Study for Municipal Wastewater Treatment Plants" led by PG&E.</p> <p>While the study includes elements of existing conditions baselines and industry standard practice baselines, Table ES-4 (page 7) and Table 6-2 (page 22) clearly identify NEMA Premium Efficiency motors as ISP. The study did not distinguish among primary, secondary, or tertiary wastewater treatment stages when characterizing motor baselines. The review team therefore interprets the study's overarching motor ISP guidance as applicable to the RAS and WAS pump motors affected by this project.</p>	Baseline		
2	<p>The 2015 WWTP Baseline Study's Section 6.1.1 recommends that ISP baseline for pump replacements reflects the average of at least three market options that accommodate a customer's process requirements: "It is thus recommended that the pump efficiencies from at least 3 manufacturers be averaged to be the basis for the baseline efficiency based on the pump type, flow, total head and other parameters (e.g. solids size)." Please revise the pump replacement measure's second-period baseline to reflect the ISP guidance recommended in the 2015 WWTP Baseline Study.</p> <p>The study acknowledges that the ISP baseline recommendation in the 2006 predecessor study-- the Hydraulic Institute Achievable Efficiency curves-- may overestimate the true maximum achievable efficiency due to site-specific variations in solids size. Since the project developer estimated second-period savings using a standard practice baseline of Hydraulic Insitute Achievable Efficiency, the second-period savings may increase as a result of this baseline revision.</p>	Baseline		

Note or Instruction Number:	CPUC Staff Notes or Instructions:	Instruction Category	PA Response	ED Resolution
1	The measure description in the bi-monthly upload incorrectly describes the customer as located in Climate Zone 3. Please revise to reflect Climate Zone 13.	Other 1		

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.