

## CPUC Staff Ex Ante Review

CPUC Staff Project ID Number	PGE_22_T_I_743_PRJ - 03347026_Process
CMPA Directory Link	<a href="https://deeresources.info/cmpa/projects/20175">https://deeresources.info/cmpa/projects/20175</a>
PA	PGE
PA Application ID	PRJ - 03347026
PA Application Executed Date	
PA Program ID	PGE_Ind_002
PA Program Name	CLEAResult - Business Energy Performance Ind - Customized Retrofit
PA Program Year	
Date of CPUC Staff Review:	4/5/2022
PA CMPA Upload Dates Included in this review:	
First PA Upload	2/22/2022
Second PA Upload	3/8/2022
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-OTHER GAS-DEHYDRATOR
Measure 2	
Measure 3	
Measure 4	
Measure 5	
Measure 6	
Measure 7	
Measure 8	
Measure 9	
Measure 10	
PA Project Description:	Constructing a canopy over piles of reclaimed asphalt pavement RAP to reduce moisture content will result in significant saving of gas therms in the drying process during the winter rainy months
Bi-Monthly Upload kW Demand Reduction	0.0
Bi-Monthly Upload Annual kWh Impacts	0.0
Bi-Monthly Upload Therm Impacts	8,876.1
PA Proposed Incentive \$ (to Customer)	\$11,095.13
Project Documentation kW Demand Reduction	0.0
Project Documentation Annual kWh Impacts	0.0
Project Documentation Annual Therm Impacts	8,876.1
Project Documentation Incentive \$ (to Customer)	11,095.1
CPUC Staff Primary Reviewer Name	
CPUC Staff Primary Reviewer Firm	DNV
CPUC Staff Review Supervisor Name	
CPUC Staff Review Supervisor Firm	Quantum
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
1	This is not an AOE (Add-On Equipment) measure as proposed by the PA. The AOE measure should improve the nominal efficiency of the host system (dryer in this case). This project does not increase the host equipment efficiency. We are not approving this project as AOE but allowing it to go through as a BRO-Op (Behavioral, Retrocommissioning, and Operational) measure. Please revise the project using BRO-Op MAT.	Measure type		

2	<p>According to the PA, the host system (i.e., the dryer) is critical to operations and therefore will be repaired/replaced indefinitely. The PA uses this argument to conclude that the RUL of the existing host equipment is assumed to be equal to the EUL of the host (20 years). It is not acceptable to claim the entire EUL of an existing (installed in the past) equipment as the RUL of the measure. This measure is not approved as AOE so this issue will not impact life-cycle savings but repair indefinitely cannot be used to claim that the RUL is equal to EUL for equipment that are not new.</p>	CPUC Policy		
3	<p>From the project documentation, it appears that the PA did not have any technical influence on this project. However, this was not clearly stated in the project documentation. According to the project feasibility study, "CLEAResult reviewed the project <u>proposed by the customer</u> and <u>completed</u> calculated energy savings analysis." From provided emails, it appears that all the savings assumptions are also provided by the customer. For the future project, we are requesting the PA to clearly state wheatear the project was proposed by the PA or the customer. The narrative should also clearly explain who did the technical analysis on the project.</p> <p>Additionally, savings are estimated based on some rough assumptions. Using these rough assumptions and based on the energy cost savings, the project pays back in 9.4 years without incentive and 8.5 years after incentives. This does not indicate that there is any financial influence given the customer would only consider projects with payback of 3 years or less. Then the PA adds the non-energy cost savings to the project. This analysis shows that the project pays back in 3.2 years without incentives (slightly higher than the customer payback threshold) and the incentive reduce the payback to 2.9 years (slight less than customer threshold). This, again, does not provide clear evidence supporting the financial influence. Note that the assumptions are rough and using actual savings may result in higher or lower payback.</p> <p>Given the size of the project, we are allowing this project to go forward but requesting the PA to address these issues for future projects.</p>	Program influence		



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"> <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>
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.