

CPUC Staff Ex Ante Review

CPUC Staff Project ID Number	PGE 22 T I 751 PRJ - 03325056 Process Distribution
CMPA Directory Link	https://deeresources.info/cmpa/projects/20197
PA	PGE
PA Application ID	PRJ - 03325056
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:	4/19/2022
PA CMPA Upload Dates Included in this review:	
First PA Upload	3/6/2022
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-VFD
Measure 2	PROCESS RETROFITNEW-PUMPS-VFD
Measure 3	
Measure 4	
Measure 5	
Measure 6	
Measure 7	
Measure 8	
Measure 9	
Measure 10	
PA Project Description:	[REDACTED] - Water Injection Reconfiguration
Bi-Monthly Upload kW Demand Reduction	112.6
Bi-Monthly Upload Annual kWh Impacts	1,404,982.4
Bi-Monthly Upload Therm Impacts	0.0
PA Proposed Incentive \$ (to Customer)	\$137,763.78
Project Documentation kW Demand Reduction	112.6
Project Documentation Annual kWh Impacts	1,404,982.4
Project Documentation Annual Therm Impacts	0.0
Project Documentation Incentive \$ (to Customer)	113,070.5
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 (M&V Results and Final Calculations) Required

Action Number:	Summary of CPUC Staff Required Action by the PA:	Action Category	PA Response	ED Resolution
1	Total incentives listed in the project documentation does not match total incentives included in the bi-monthly upload (see above values). Please include the correct incentive amount in the next quarterly submission.	Other 1		
2	Please resubmit this project for post-installation review.	Continue Document Upload		
3	Please provided the signed Customer Affidavit as part of future submissions of the project.	ER preponderance of evidence		

4	Per Energy Efficiency Policy Manual and Resolution E-4939, energy savings should be calculated using a comparable level of service as the energy efficiency measure for the entire life of the measure. The PA did not properly normalize savings based on the expected level of service after the measure installation. The PA is required to revise both first and second baseline savings calculations to normalize savings based on post-installation level of service (flow).	Analysis assumptions		
5	Please update the M&V plan to at minimum measure the following: 1- Document the discharge valve open position %, suction pressure, discharge pressure and flow for two weeks with the existing trending arrangement. 2- Conduct a spot measurement (or a short term power/current logging) of kW for both new main pump and booster pump after the completion of the project.	M&V plan		
6	Per the Statewide Project Guidance document, for Normal Replacement (NR) and Accelerate Replacement (AR) measures, existing equipment must be decommissioned and removed from site. Decommissioned equipment must not be reused, sold, or retained for backup purposes without PA pre-approval. The PA is proposing to keep the existing equipment onsite and use them as backup. Please provide documentation showing this is acceptable by the PA for future submissions of the project.	Missing required information		
7	The PA estimated second baseline savings using a predicted production level in future. This approach is not acceptable, and the PA should estimate both first baseline and second baseline savings based on verified post-installation production. As stated before, the PA is required to normalize both first and second baseline savings based on post-installation production.	Analysis assumptions		
8	Please provide analysis to show appropriate standard practice baseline assessment for the second baseline calculations. The PA did not provide enough information to show all options that are functionally, technically, and economically feasible to implement at the end of RUL (remaining useful life). For example, it is not clear to us why the smaller sized pump (with or without VFD) is not the standard practice baseline when existing equipment are at the end of their RUL. Please update the second baseline savings based on this information.	Baseline		
9	The PA used two different flow rates to estimate savings for two pumps (the main pump and the booster pump) included in the scope of the project. Savings associated with both of these pumps should be calculated using the same flow that is measured at the post-installation stage. Please update savings calculation to use the same flow (post-installation flow) for both pumps.	Analysis assumptions		

Note or Instruction Number:	CPUC Staff Notes or Instructions:	Instruction Category	PA Response	ED Resolution
1	The project pays back in 1.2 years without incentives. The customer internal payback threshold for funding energy efficiency projects are 2 years. It is not clear why the customer needed incentives for this project. The PA also indicates that 0% financing was available for this project but did not clearly state why this project didn't receive financing instead of incentives, given the very short payback.	Program influence		
2	It's difficult to read the pdf files submitted in the project package (e.g., Att 5_PRJ - 03325056 PRE POE_v2-CONF) due to confidentiality marks. Please include readable version of these documents for future submissions of this project.	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.