

## CPUC Staff Ex Ante Review

CPUC Staff Project ID Number	PGE 23 T C 874 PRJ - 04270266_Process
CMPA Directory Link	<a href="https://deeresources.info/cmpa/projects/20911">https://deeresources.info/cmpa/projects/20911</a>
PA	PGE
PA Application ID	PRJ - 04270266
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:	7/7/2023
PA CMPA Upload Dates Included in this review:	
First PA Upload	5/9/2023
Second PA Upload	5/30/2023
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-OIL WELL-PROCESS OPTIMIZATION
Measure 2	PROCESS RETROFITNEW-IMPROVED CONTROLS
Measure 3	
Measure 4	
Measure 5	
Measure 6	
Measure 7	
Measure 8	
Measure 9	
Measure 10	
PA Project Description:	The scope of the project is to implement a new technology catalyst to the Shift reactor and add several controls and meters to the process to increase operational efficiency optimize production and save on gas utilities
Bi-Monthly Upload kW Demand Reduction	0.0
Bi-Monthly Upload Annual kWh Impacts	0.0
Bi-Monthly Upload Therm Impacts	463,670.2
PA Proposed Incentive \$ (to Customer)	\$718,688.75
Project Documentation kW Demand Reduction	0.0
Project Documentation Annual kWh Impacts	0.0
Project Documentation Annual Therm Impacts	463,670.2
Project Documentation Incentive \$ (to Customer)	718,688.8
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	Please submit the project for our review again once post-installation data has been collected and savings have been adjusted based on that data.	Continue Document Upload		

2	<p>The PA has stated an estimated 11 years of EUL for the combustion control measure (EEM2) based on the customer's claim that the heater typically lasts 25 years, considering the installation year in 2009. However, the PA has not provided any supporting documentation to justify why 25 years is the appropriate EUL for the heater. <b>Please revise the EUL of the host equipment to 20 years, which aligns with the DEER EUL for a process boiler. Additionally, please provide evidence indicating the installation date of the heater. Furthermore, please provide historical data that substantiates the claimed EUL for the catalyst replacement.</b></p>	EUL/RUL		
3	<p>It is not clear why an NR MAT (Normal Replacement Measure Application Type) was utilized for the replacement of the catalyst, considering that the existing catalyst was installed in 2016 and a recent inspection confirmed its remaining useful life for another cycle. The customer's vendor conducted an inspection and determined that the catalyst could last until the next planned plant shutdown, which occurs every four years. Moreover, the customer has already identified this measure as a potential improvement and included it in their internal general plant improvement plan. Additionally, the customer is currently piloting this catalyst at a different facility, further indicating their intention to implement it in the future, likely during the next shutdown. These circumstances suggest that this project could be considered as an Accelerated Replacement, and the technology has the potential to become the customer's standard practice in the near future. <b>Please review and update the MAT and the measure EUL in the next submission of the project.</b></p>	Measure type		
4	<p><b>Please update the hours of use for both measure based on actual plant data and use consistent values for both measures.</b></p>	Analysis assumptions		

Note or Instruction Number:	CPUC Staff Notes or Instructions:	Instruction Category	PA Response	ED Resolution
1	Measure are beings implemented at the Hydrogen plant associated with this refinery.	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"> <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.