

CPUC Staff Ex Ante Review

CPUC Staff Project ID Number	PGE_20_T_I_557_PRJ - 02029385 Process
CMPA Directory Link	https://deeresources.info/cmpa/projects/18694
PA	PGE
PA Application ID	PRJ - 02029385
PA Application Executed Date	6/25/2020
PA Program ID	PGE21027
PA Program Name	Heavy Industry Energy Efficiency Program (PCIP)- Customized Retrofit Industrial Systems Optimization Program (IR)
PA Program Year	2023
Date of CPUC Staff Review:	12/8/2022
PA CMPA Upload Dates Included in this review:	
First PA Upload	8/11/2020
Second PA Upload	9/1/2020
Third PA Upload	10/24/2022
Fourth PA Upload	
Fifth PA Upload	
Sixth PA Upload	
Seventh PA Upload	
Eighth PA Upload	
PA Measure Description(s):	
Measure 1	PROCESS RETROFIT/NEW-OTHER GAS-MODIFY PROCESS
Measure 2	PROCESS RETROFIT/NEW-OTHER GAS-MODIFY PROCESS
Measure 3	
Measure 4	
Measure 5	
Measure 6	
Measure 7	
Measure 8	
Measure 9	
Measure 10	
PA Project Description:	0
Bi-Monthly Upload kW Demand Reduction	0.0
Bi-Monthly Upload Annual kWh Impacts	0.0
Bi-Monthly Upload Therm Impacts	147,940.0
PA Proposed Incentive \$ (to Customer)	\$110,773.00
Project Documentation kW Demand Reduction	0.0
Project Documentation Annual kWh Impacts	0.0
Project Documentation Annual Therm Impacts	147,940.0
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 (M&V Results and Final Calculations) Required

12/8/2022

Action Number:	Summary of CPUC Staff Required Action by the PA:	Action Category	Due Date	PA Response	ED Resolution
1	Please resubmit the project after post-installation data identified in "PRJ-02029385_TR_RFIR_v1_071420-CONF" and "PRJ-02029385_TR_RFIR-v1_071420 TRC Response-CONF" has been collected and trued-up savings are estimated. The CPUC staff requires a complete review of the final regression model (including how the model will be adjusted for pre- and post- oxygen level and production as well as fractional savings uncertainty) that will be used to estimate savings. Based on the submitted M&V plan, it's not clear how the project developer intends to adjust the baseline model for post-install conditions including production and oxygen levels. This analysis should be submitted in a fully functional unprotected workbook. Similarly, if engineering analysis is used to estimate the final savings, CPUC staff will review the engineering approach and input assumptions.	Calculation method	N/A	The key production metrics identified by the reviewer were logged during the performance period. The % cullet and ratio of thermal energy provided by natural gas and electricity were found to vary by more than 5%, so the M&V plan was followed. For the data points during the performance period where the variation of more than 5% occurred, the baseline average % cullet was used with the performance period oxygen to estimate the gas use. All calculations performed for the savings analysis have been provided in an unprotected workbook titled "PRJ-02029385_FurnaceCalculationsAndResults_V3_CONFIDENTIAL.xlsx". Fractional savings uncertainty was computed to be 2.6% for Furnace 1 and 14.5% for Furnace 2. The calculations for these values are provided in "PRJ-02029385_Furnace1_FSUAnalysis_V3_CONFIDENTIAL.xlsx" and "PRJ-02029385_Stack_Temperature_Raw_Data_CONFIDENTIAL.xlsx".	No further action.

2	According to the PA's technical reviewer, if statistically valid relationships are found between gas and electric use at either furnace, an assessment of fuel switching impacts (if any) shall be performed consistent with the CPUC policies. The post-installation package should include an explanation of how this review finding was addressed.	Calculation method	N/A	To address the concern about potential increases in electricity use for furnace boost, any increase in electricity use compared to baseline was considered fuel switching. The fuel switching calculator was use to compute the amount the total gas savings calculated should be reduced by to account for the increase in electricity use.	There are a few locked cells so ED could not confirm the conversion math. There is evidence showing the fuel switching calculator was used to account for the electricity increase and the final therm savings in the analysis files accounted for that. No further action.

Note or Instruction Number:	CPUC Staff Notes or Instructions:	Instruction Category	Due Date	PA Response	ED Resolution

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. 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.</p> <p>– Section 381.2 (g) (3) (F)</p>