

CPUC Staff Ex Ante Review

CPUC Staff Project ID Number	PGE 23 T 913 PRJ - 04528338 Process
CPUC Directory Link	https://deeresources.info/cmpa/projects/21108
PA	PGE
PA Application ID	PRJ - 04528338
PA Application Executed Date	
PA Program ID	PGE Ind 002
PA Program Name	Business Energy Performance Ind - Customized Retrofit
PA Program Year	
Date of CPUC Staff Review:	1/9/2024
PA CMPA Upload Dates Included in this review:	
First PA Upload	11/21/2023
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	PROCESS RETROFITNEW-PUMPS-VFD
Measure 4	
Measure 5	
Measure 6	
Measure 7	
Measure 8	
Measure 9	
Measure 10	
PA Project Description:	Add on Equipment AOE to existing nine 350 hp Disposal Well Injection Pumps
Bi-Monthly Upload kW Demand Reduction	262.4
Bi-Monthly Upload Annual kWh Impacts	2,133,596.6
Bi-Monthly Upload Therm Impacts	0.0
PA Proposed Incentive \$ (to Customer)	\$219,261.97
Project Documentation kW Demand Reduction	262.4
Project Documentation Annual kWh Impacts	2,133,596.6
Project Documentation Annual Therm Impacts	0.0
Project Documentation Incentive \$ (to Customer)	219,262.0
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	Due Date
1	Please revise the host equipment EUL to 9.3 years to reflect the PumpTurbBstr DEER EUL_ID. Given that the affected pumps move process water to various disposal wells, the review team believes their operation resembles agricultural well pumps more closely than variable-speed HVAC pumps (as suggested by the HVAC-VSD-pump host EUL claim of 15 years).	EUL/RUL			

2	<p>Please revise the measure EUL to reflect the default RUL of the host equipment: 3.1 years. Per PFS (page 22): "the customer had stated that the pumps [are] at most repaired every 5 years and the last time that these pumps were repaired was 3 years ago." Resolution E-4952 (page A-37) states that "for newly installed or replaced equipment that includes a new add-on equipment component, the add-on equipment savings may use the EUL rather than the RUL of the host equipment as a limit." Since the affected pumps were repaired, not newly installed or replaced, the E-4952 exception does not apply. The lone exception may be Pump #4 at the facility, which was newly installed in the last two years according to the PFS (page 21). If the PA and implementer can provide evidence that the pump was recently installed, its VFD may claim the difference between the 9.3 year host EUL and the age of the pump.</p>	EUL/RUL		
3	<p>Please increase the duration of post-project metering to 4 weeks. The M&V plan currently proposes 2 weeks of post-project metering, while the pre-project metering period comprised 3 weeks. However, the pre-project conditions involved constant-speed pumps that operated 24/7, while the post-project pumps will modulate their speed based on process flow requirements. The review team recommends a longer post-project metering period to establish the typical profile of pump speeds required.</p>	M&V plan		

Note or Instruction Number:	CPUC Staff Notes or Instructions:	Instruction Category	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 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.