



1	<p><b>The PA is required to adhere to CPUC custom rules for this project and make necessary revisions to ensure compliance with all relevant custom rules. This includes providing documentation related to program influence, as mandated by E-5115, utilizing custom Net-to-Gross (NTG), and providing Fuel Substitution test.</b> This project was initially identified and planned by the customer prior to their engagement with the SEM program. According to the PFS, "The customer did consider adding a 3rd stage evaporator to the current evaporator system. However, after discussing the THOR project with another tomato producer, the customer changed their mind.", and "The customer was made aware of this potential energy efficiency opportunity (including the FPIP grant and PG&amp;E incentive program) from another tomato processor who completed a similar project with CLEARResult that required incentive and FPIP grant financial support. The other processor provided CLEARResult's contact information to this customer to aid in securing financial incentives and provide engineering support to quantify potential savings."</p> <p>The PA did not provide substantial evidence demonstrating that this project resulted from the SEM program's engagement with the customer. Per CPUC policy, SEM rules, including an NTG of 1, can only be applied to projects stemming from SEM participation, as outlined in D. 23-02-002. According to D. 23-02-002, "D.16-08-019 also allowed for a net-to-gross ratio (NTGR) of 1.0 to be applied to all projects resulting from statewide industrial SEM programs adhering to a very specific program design that ensures customer participation, education, and tracking of program/project performance."</p> <p>The PA's submission lacks proof that the project was an outcome of SEM participation, and it's essential to note that the customer specifically requested custom incentives, rejecting SEM incentives when presented with both options by the program. According to the customer, this project would not have been financially viable with SEM incentives.</p> <p>The PA did not provide complete program influence documentation per E-5115, even after we requested this information to be submitted in an SDR.</p>	CPUC Policy		
2	Please ensure that the fuel substitution test is passed before implementing this project. This should be documented in the project package.	Fuel switching		
3	According to the M&V plan and project files, flow meters are only installed on the boilers, and there is no metering in place for measuring steam consumption by the evaporators. The updated PA files do not provide clear information regarding whether the plant intends to install steam flow meters on the evaporators to accurately measure the changes in steam consumption caused by this measure. Considering that the evaporators are the primary consumers of steam and are critical equipment affected by this measure, and that there are other steam-consuming devices that might experience changes in steam consumption, <b>the PA is required to revise the M&amp;V plan to include additional provisions for metering. Specifically, the PA should ensure the installation of steam flow meters on the inlet of all evaporators within System A and B for baseline and installed case, in addition to the existing meters on the boilers.</b> This will enable precise measurement of steam consumption across all relevant equipment and ensure accurate monitoring of the impact of the measure.	M&V plan		
4	In response to our SDR seeking clarification on the project's impact on the second evaporation line (System A), the PA extended the measure boundary beyond the three evaporators in System B to encompass the evaporators in System A. However, the PA's analysis is based on the assumption that the proposed pre-evaporator is connected to System B only. <b>The final savings should be based on an analysis that covers both System A and System B. This entails assessing how the proposed pre-evaporator affects the energy usage of both systems, ensuring final savings are based on the measure's impact on the entire system.</b>	Calculation method		
5	The PA collected baseline data, including infeed flow to evaporators, percentage flow distribution among evaporators, incoming and outgoing product BRUX, water evaporated in evaporators, etc., from the existing systems in 2020, while production data from 2022 was used. This approach of using outdated system performance data in conjunction with more recent production data is not appropriate for accurate savings analysis. The PA did not explain why this approach was used. <b>To accurately estimate the savings, we recommend should utilizing the most recent system performance data available, paired with corresponding production data from the same period, to calculate savings accurately unless there is a valid reason for using data sets from two different time periods. If so, the PA should provide a rationale behind using two different data sets for calculating savings.</b> Furthermore, the calculations should maintain consistency in annual steam usage rates for both systems, aligning them with their annual feed rates reported in the same and most recent year. The current annual energy intensities, as indicated in "PRJ - 04357816 PRE Submitted Savings Calcs_v9-CONF.xlsx," differ from those calculated based on "PRJ - 04357816 triple vs 9-2021-CONF.xlsx." Therefore, the PA should revise the energy and mass balance worksheet using data from the same and most recent baseline year and revise the final savings analysis based on this updated information.	Calculation method		
6	The introduction of the new pre-evaporator is expected to reduce the number of tomato processing operation days, allowing the facility to produce more products within the same tomato processing period. However, as per the PA's information, the plant does not have an interest in utilizing the additional production capacity that may result from this project. <b>Therefore, the PA is required to cap the savings at the current product quantity, quality, and mix.</b> This means that the analysis should be based on the assumption that the plant will not extend its production beyond the existing levels, even though the potential exists due to the increased productivity resulting from the pre-evaporator.	Calculation method		

Note or Instruction Number:	CPUC Staff Notes or Instructions:	Instruction Category	PA Response	ED Resolution
1	Since the customer is participating in SEM, the baseline for the SEM project must account for the savings from this pre-identified non-SEM measure to accurately calculate the energy savings from SEM implementation.	Calculation method		

CPUC Staff Recommendation Definitions	
CPUC Staff Recommendation	Definition
<b>Application ready to proceed without exception</b>	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.
<b>Application ready to proceed with exception(s), as noted</b>	<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>
<b>Application rejected.</b>	<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>
<b>Advisory.</b>	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.