

### CPUC Staff Ex Ante Review

CPUC Staff Project ID Number	PGE 23 T I 924 PRJ - 04633466 CompAir
CPMA Directory Link	<a href="https://deeresources.info/cma/projects/21173">https://deeresources.info/cma/projects/21173</a>
PA	PGE
PA Application ID	PRJ - 04633466
PA Application Executed Date	
PA Program ID	PGE210212
PA Program Name	Industrial Compressed Air System Efficiency program - Customized Retrofit
PA Program Year	
Date of CPUC Staff Review:	2/19/2024
PA CMA Upload Dates Included in this review:	
First PA Upload	1/3/2024
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 COMPRESSED AIR - ADD CONTROLS - To-CodeStd
Measure 2	
Measure 3	
Measure 4	
Measure 5	
Measure 6	
Measure 7	
Measure 8	
Measure 9	
PA Project Description:	A PET bottling facility automation project aims to control low and high-pressure air compressors by implementing a central automation system as an AOE project
Bi-Monthly Upload kW Demand Reduction	113.5
Bi-Monthly Upload Annual kWh Impacts	1,011,747.0
Bi-Monthly Upload Therm Impacts	0.0
PA Proposed Incentive \$ (to Customer)	\$69,217.32
Project Documentation kW Demand Reduction	113.5
Project Documentation Annual kWh Impacts	1,011,747.0
Project Documentation Annual Therm Impacts	0.0
Project Documentation Incentive \$ (to Customer)	69,217.3
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

Action Number:	Summary of CPUC Staff Required Action by the PA:	Action Category	PA Response	ED Resolution	Due Date
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1	<p>The PFS's M&amp;V plan (page 40) states that "an easier approach to assess the full impacts of this project is to simply measure all the input power and all airflow into the plant, and analyze the scfm/kW pre and post project." However, the M&amp;V plan is unclear on how the pre-project scfm/kW will be quantified, as airflow was not measured as part of pre-installation M&amp;V. Instead, the pre-project airflow was estimated via metered kW data paired with generic cfm/kW performance curves referenced from AirMaster+. Given that the affected compressed air system is complex, with high-pressure compressors acting as boosters to low-pressure lines, the use of generic AirMaster curves may not be appropriate for quantifying the pre-project compressor efficiency.</p> <p>The M&amp;V plan should be revised to more clearly describe how pre- and post-project scfm/kW efficacies, which directly impact the achieved savings, will be measured and calculated. Since the proposed measure includes the ability to trend "all known system parameters including information on system pressures, total power, flow, system efficiency, and other parameters" (PFS page 31), one option for defining baseline scfm/kW is to collect these data trends for at least one week <i>before</i> the controls optimizations are fully programmed and commissioned. This brief period of trended pre-intervention data will establish actual scfm/kW data in the baseline case before the post-project scfm/kW increase and associated savings are realized.</p> <p>For the reasons above, the review team has requested to reexamine this project during the post-installation stage.</p>	M&V plan		
2	<p>The derivation of peak demand savings is unclear. The peak demand calculation in the "DEER Peak Demand Study" xls file shows hard-coded baseline and proposed kW values during the DEER-defined peak days/hours. The spreadsheet and associated documentation (PFS, tech review documents) should explain how the hourly kW values in the proposed case were derived.</p>	Analysis assumptions		

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. 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.