

## CPUC Staff Ex Ante Review

CPUC Staff Project ID Number	PGE_24_T_I_930_PRJ - 03347074_Process
CMPA Directory Link	<a href="https://deeresources.info/cmpa/projects/21226">https://deeresources.info/cmpa/projects/21226</a>
PA	PGE
PA Application ID	PRJ - 03347074
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:	3/25/2024
PA CMPA Upload Dates Included in this review:	
First PA Upload	2/12/2024
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 RETROFITNEW-FAN-VFD
Measure 2	
Measure 3	
Measure 4	
Measure 5	
Measure 6	
Measure 7	
Measure 8	
Measure 9	
Measure 10	
PA Project Description:	Add VFD to a 2000 hp single speed fan motor that currently has damper flow contro
Bi-Monthly Upload kW Demand Reduction	258.0
Bi-Monthly Upload Annual kWh Impacts	1,564,522.8
Bi-Monthly Upload Therm Impacts	0.0
PA Proposed Incentive \$ (to Customer)	\$113,224.71
Project Documentation kW Demand Reduction	258.0
Project Documentation Annual kWh Impacts	1,564,522.8
Project Documentation Annual Therm Impacts	0.0
Project Documentation Incentive \$ (to Customer)	113,224.7
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
1	<p>The project submittal does not specify the negative pressure setpoint currently maintained by the existing scrubber fan and damper. As a result, it is not possible to assess if the proposed system will provide an equivalent level of service as the existing system. Please amend the submittal to include the following information prior to project implementation to allow fair comparison between baseline and proposed cases:</p> <ul style="list-style-type: none"> <li>- The negative pressure setpoint maintained by the existing scrubber fan and damper.</li> <li>- Description of the existing fan's control system to maintain the desired negative pressure setpoint.</li> </ul> <p>The PFS indicates that the venturi inlet temperature serves as a proxy for kiln operation and therefore is used to modulate the existing fan damper. However, it is unclear if and how venturi inlet temperature or damper position correlates with the negative pressure required for the facility's process.</p> <ul style="list-style-type: none"> <li>- More detailed description of the proposed system's control logic to maintain negative pressure. Specifically, it is unclear which variable(s) will serve as inputs to the VFD's control logic to maintain the desired output (negative pressure). This information should inform the M&amp;V plan's approach to verifying the operation of the installed controls system.</li> </ul>	Analysis assumptions		
2	<p>Based on the information requested above, the baseline operation may have to be adjusted to reflect fair comparison with the proposed system. The submitted M&amp;V plan does not provide sufficient explanation of how the baseline data would be adjusted to reflect post-installation conditions established through M&amp;V.</p>	M&V plan		

Note or Instruction Number:	CPUC Staff Notes or Instructions:	Instruction Category	PA Response	ED Resolution
1	The review team requests that this project is submitted for post-installation review given the uncertainties identified in the above disposition items.	Continue Document Upload		
2	The baseline annual kWh consumption values are inconsistent. Per the project file "PRJ - 03347074_PRE Usage History-CONF.xlsx", the annual consumption was [REDACTED]. Page 13 of the pre-project report has the annual electrical usage at [REDACTED]. Page 4 of 9 of the file "PRJ - 03347074 PRE PA Review_Approved.docx" has reported the annual usage at [REDACTED]. Similarly, the maximum kW demand values are also inconsistent.	Other 1		

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.