

CPUC Staff Ex Ante Review

CPUC Staff Project ID Number	SCE_22_C_C_762 [REDACTED].Process
CMPA Directory Link	https://deeresources.info/cmpa/projects/20333
PA	SCE
PA Application ID	[REDACTED]
PA Application Executed Date	[REDACTED]
PA Program ID	SCE-13-SW-002B
PA Program Name	Commercial Calculated Program
PA Program Year	[REDACTED]
Date of CPUC Staff Review:	8/26/2024
PA CMPA Upload Dates included in this review:	[REDACTED]
First PA Upload	5/5/2022
Second PA Upload	NA
Third PA Upload	NA
Fourth PA Upload	
Fifth PA Upload	
Sixth PA Upload	
Seventh PA Upload	
Eighth PA Upload	
PA Measure Description(s):	
Measure 1	Commercial pump system overhaul [REDACTED] retrocommissioning
Measure 2	
Measure 3	
Measure 4	
Measure 5	
Measure 6	
Measure 7	
Measure 8	
Measure 9	
Measure 10	
PA Project Description:	This is for SCEs legacy commercial calculated program Retrofit of the impeller and bowl assembly and pump upgrades will improve the efficiency of [REDACTED]
Bi-Monthly Upload kW Demand Reduction	[REDACTED]
Bi-Monthly Upload Annual kWh Impacts	[REDACTED]
Bi-Monthly Upload Therm Impacts	[REDACTED]
PA Proposed Incentive \$ (to Customer)	[REDACTED]
Project Documentation kW Demand Reduction	[REDACTED]
Project Documentation Annual kWh Impacts	[REDACTED]
Project Documentation Annual Therm Impacts	[REDACTED]
Project Documentation Incentive \$ (to Customer)	[REDACTED]
CPUC Staff Primary Reviewer Name	[REDACTED]
CPUC Staff Primary Reviewer Firm	[REDACTED]
CPUC Staff Review Supervisor Name	[REDACTED]
CPUC Staff Review Supervisor Firm	[REDACTED]
PA Primary Reviewer Name	[REDACTED]
PA Primary Reviewer Firm	[REDACTED]
CPUC Staff Project Manager	[REDACTED]
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

1	<p>Please resubmit the project for post-installation review. It is not clear whether baseline pump performance curve will be used to validate viability under the post-operating conditions and whether baseline OPE will be normalized under post-installation head conditions (in addition to flow conditions). Both of these are needed to establish the level of service equivalency. We would like to see the project at the post-installation stage to review how savings are normalized.</p>	Continue Document Upload	<p>The savings results are calculated by normalizing the savings based on TDH measured in the baseline pump tests. Rather than estimating the post installation efficiencies using the post pump curve the post tests were conducted under similar TDH conditions. Due to the varying hydraulic nature of the [REDACTED] operations the TDH are not exactly the same. However the baseline and post TDH conditions are within [REDACTED]%. Post-overhaul energy is calculated by multiplying the post-overhaul pump power input (measured motor kW) by the ratio of the pre-to-post measured pump flow multiplied by the pre-overhaul pump runtime.</p>	<p>The facility has an SCADA system capable of trending flow data; however SCE did not provide any flow data to support the analysis. The only flow data included in the project package are from older pump tests which are merely snapshots of pump operations during the test and do not represent actual operation. Additionally SCE used flow calculations from a test conducted by the facility staff in [REDACTED] that was not documented anywhere. We do not have evidence of the actual system operation required to estimate savings. Pump test data also show that the pump flow rates changed between pre-installation pump tests conducted in [REDACTED] and post-installation pump tests in [REDACTED] with no explanation provided for this change in service level requirements. These tests were also not conducted consistently at varying VFD frequencies for both pre- and post-installation. Furthermore the PA did not explain why it is appropriate to use pre-installation data that are over [REDACTED] years old to estimate final savings. All of these issues along with the calculation approach (see note #1) create uncertainty regarding the validity of the final calculated savings.</p>
---	---	--------------------------	---	---

Note or Instruction Number:	CPUC Staff Notes or Instructions:	Instruction Category	PA Response	CPUC Response
1	<p>Please refer to our response to SCE-033 Early Opinion for Pump Overhaul Clarifications (available here: https://deeresources.info/cmpa/projects/20722) where we extensively discussed why the use of the pre/post OPE approach is not appropriate. In this Early Opinion response we explain the appropriate M&V and SCADA data needed to correctly calculate pump overhaul savings. This direction was also provided to all PAs in a statewide disposition issued for a PG&E project and communicated to all PAs in the "SW Pump Repair First EAR.pdf" located on CMPA here.</p>	Calculation method		

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.

<p>Application ready to proceed with exception(s), as noted</p>	<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
<p>Application rejected.</p>	<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>
<p>Advisory.</p>	<p>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.</p>