

## EARLY OPINION (EO) REQUEST FORM V1

The information provided in this request form will be used to request an early opinion from CPUC staff.

PA may request an early option (EO) review on projects in the development stage that are not ready for full project review. Early opinion requests may include any aspect of project development, such as policy question, appropriate baseline, calculation techniques, preponderance of evidence documentation, program influence and so on. Early opinion requests may reference a specific project or cover issues relevant to multiple projects.

Early opinion requests must be in the form of a set of specific questions with the PA first stating clearly the issue(s) or the policy 'gray-area'. The PA is expected to provide its opinion/thought on the 'gray-area' issue then specifically ask on what it wishes to ask the CPUC staff.

Early Opinion Information		Date Tracking (IOU USE)	
EO Title	Compressed Air Leak Repair	EO Study Request	01/08/2020
EO Tracking Number	SCE-005	ED Response	

EO Requestor			
PA, Implementer	SCE	<input type="checkbox"/> Gas / <input checked="" type="checkbox"/> Electric	
Department	██		
Contact Name(s)	██████	Telephone #	████████
Contact email(s)	████████████████████		
Program Name	██		

**EO Question 1.**

Historically, compressed air leak repair measure was considered to be ineligible and it was perceived as the routine maintenance activity.

SCE is seeking CPUC custom project review team’s input and view on compressed air leak repair measure eligibility by classifying it as behavioral, retrocommissioning and operation (BRO) before SCE further investigates to address SCE’s concerns outlined below.

**PA Opinion/Proposed Response:**

E-4818 (page 28, Section 1.3.6.4) directs savings from correcting deferred maintenance, performance restoration and operational characteristics to be considered within Behavioral, Retrocommissioning, and Operation (BRO) measure application type.

*“Measures installed within the BRO installation type are assigned an existing conditions baseline and may include measures that either restore or improve energy efficiency, and can be reasonably expected to produce multi-year savings. For deemed and calculated savings determination, savings from correcting deferred maintenance, performance restoration and operational characteristics are considered within this category only. In cases where these savings are a component of the savings captured through equipment replacement, separate claims should be made for the equipment replacement savings and savings that arise from updating maintenance and operational factors.”*

Based on E-4818, SCE’s opinion is that a compressed air leak repair measure should be eligible and classified as a BRO measure. However, we have a concern about 1) establishing project qualifying requirements, 2) identifying pre-installation and post-installation conditions and methodology of leak level detection, and 3) developing a reasonable pre- and post-installation M&V plan.

**Commission Staff Response:**

Commission staff agrees that compressed air system leak repair is a qualifying BRO measure under current rules. Specific requirements for leak repair activities should include:

1. Program Requirements –Exclude customers with existing leak repair programs and offer this measure on a one time per customer basis. Note: compressed air plants with modulating compressors may not yield much savings; SCE might want to limit activities to compressed air plants with non-modulating compressors. Consider bundling leak repair with improved compressor sequencing to maximize savings.
2. Methodology of leak detection – Use an ultrasonic leak detector with leak tags to flag, document and quantify leaks. All tags should be entered into a spreadsheet for tracking.
3. M&V –Leak detectors are not sufficiently reliable to estimate actual leakage flowrate. Utilize pre and post compressor monitoring under IPMVP Option B to calculate savings.

EO Scope	
<p><b>Describe the size of the applicable markets:</b></p> <p>Is the proposed set of measures applicable to a limited or broad market? Please give your best estimate for applicable market size (the range of like customers or plants): Small (under 20) <input checked="" type="checkbox"/> Large (100+) <input checked="" type="checkbox"/> Other (please specify _____) <input type="checkbox"/></p> <p>Estimate the size of the incentive per project associated with a project subject to the EO review</p> <p><input type="checkbox"/> &lt; \$7500 <input type="checkbox"/> \$7500 – \$25000 <input checked="" type="checkbox"/> \$25000 – \$100000 <input checked="" type="checkbox"/> \$100000+ N/A or unknown</p>	
EO Category	<input checked="" type="checkbox"/> Policy <input type="checkbox"/> Measure Performance <input type="checkbox"/> Baseline <input checked="" type="checkbox"/> Calculation Technique <input checked="" type="checkbox"/> Documentation Requirements <input type="checkbox"/> Program Influence <input type="checkbox"/> Other (describe)
If Policy, SW Rulebook section and rule affected	
Measure Description	Compressed Air Leak Repair – Retrocommissioning
Industry/Market Sector	<input type="checkbox"/> Residential <input checked="" type="checkbox"/> Commercial <input checked="" type="checkbox"/> Industrial <input type="checkbox"/> Agricultural <input type="checkbox"/> Cross cutting <input type="checkbox"/> Other (describe)