

CPUC Staff Ex Ante Review

CPUC Staff Project ID Number	PGE_24_T_A_952_PRJ - 03984336_Process
CMPA Directory Link	https://deeresources.info/cmpa/projects/21343
PA	PGE
PA Application ID	PRJ - 03984336
PA Application Executed Date	
PA Program ID	PGE_Ag_001
PA Program Name	TRC - Agricultural Energy Savings Action Plan AESAP Ag - Customized Retrofit
PA Program Year	
Date of CPUC Staff Review:	11/1/2024
PA CMPA Upload Dates Included in this review:	
First PA Upload	8/13/2024
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	REFRIGERATION RETROFITNEW-SYSTEM-COMPREHENSIVE UPGRADERETROFIT
Measure 2	
Measure 3	
Measure 4	
Measure 5	
Measure 6	
Measure 7	
Measure 8	
Measure 9	
Measure 10	
PA Project Description:	This project will install a comprehensive refrigeration upgrade to continuously optimize the operation of the refrigeration system at a vegetable processor and storage facility in [REDACTED]
Bi-Monthly Upload kW Demand Reduction	82.5
Bi-Monthly Upload Annual kWh Impacts	857,315.0
Bi-Monthly Upload Therm Impacts	0.0
PA Proposed Incentive \$ (to Customer)	\$102,877.00
Project Documentation kW Demand Reduction	82.5
Project Documentation Annual kWh Impacts	857,315.0
Project Documentation Annual Therm Impacts	0.0
Project Documentation Incentive \$ (to Customer)	102,877.0
CPUC Staff Primary Reviewer Name	[REDACTED]
CPUC Staff Primary Reviewer Firm	DNV
CPUC Staff Review Supervisor Name	[REDACTED]
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 NOT Required

Action Number:	Summary of CPUC Staff Required Action by the PA:	Action Category	PA Response	ED Resolution
1	<p>The M&V plan should be amended as follows to provide more detail on post-installation verification activities:</p> <ul style="list-style-type: none"> - The plan currently does not address how the developer will verify that the installed controls system and VFDs are operating as intended. The verification plan should explicitly identify the steps after commissioning to confirm that the key system outputs (e.g., condensing pressure) are within reasonable tolerance based on the key system inputs (e.g., compressor power). - Since measure performance is driven by outside air conditions, the plan should specify the desired range of observed OATs to establish representative post-installation operation. This OAT range should then inform the metering period, which may extend beyond the proposed two weeks. This temperature coverage will ensure that pre- and post-installation M&V data lead to comparable bin analyses. 	M&V plan	<p>The M&V has been amended adding more details according to the CPUC Comments:</p> <ul style="list-style-type: none"> <input type="checkbox"/> Activity #1 Conduct site inspection to verify installation of specified equipment including proper operation. Inspection will verify the following items: <ul style="list-style-type: none"> o The saturated condensing temperature will be verified to have a minimum temperature of not more than 72 oF with an approach to wet bulb temperature of not less than 15 oF. o The evaporative condenser fans' speeds will be verified to modulate to maintain the approach to wet bulb temperature. o The evaporator fans' speeds will be verified to modulate based on room temperature. o The compressor sequencing controls will be verified to stage the compressors based on cooling load. Any change from the pre-installation assumed operation will be included in the post installation savings calculations. <input type="checkbox"/> Activity #2 Verify project costs using invoice and internal labor hours and costs. <input type="checkbox"/> Activity #3 Collect compressor, evaporative condenser fan and evaporator fan current (Amps), suction pressure, and discharge pressure in minimum 15-minute intervals for not less than two weeks. <ul style="list-style-type: none"> o Data will be collected for a minimum temperature range of 54 oF to 66 oF. This temperature range represents 80% of the temperature BIN data for DEER 2022 climate zone 3. The loggers will be kept in place for at least two weeks and until the outdoor air temperature meets the minimum and maximum in the above range. <input type="checkbox"/> Activity #4 Retrieve actual weather data from the [REDACTED] for the logging period to create regressions that are normalized to DEER2022 CZ3 weather data. <input type="checkbox"/> Activity #5 Update savings calculations to use the monitored post installation data and using post installation cooling loads for the baseline period. 	CPUC accepts the M&V plan additions.

Note or Instruction Number:	CPUC Staff Notes or Instructions:	Instruction Category	PA Response	ED Resolution
1	PFS pages 7 and 8 suggest that On-Bill Financing is required by the customer to make this project financially feasible. However, it is unclear from the submitted influence narrative and evidence if OBF will be pursued by the customer and how it contributes to the program's financial influence.	Program influence	The Customer is going to move forward with the OBF. TRC has already started the process with the OBF Team per the Customer request.	Thank you for the clarification.
2	PFS page 8 and Attachment PD-2 (meeting minutes from February 2023) suggest that the customer is considering a wind turbine power purchase agreement, and that its incentive could help support financing for this and other potential EE projects. It is unclear if the customer moved forward with the power purchase agreement or if it affects this specific facility. If so, the post-installation verification should include the associated non-IOU analysis to ensure that the final savings claims reflects utility-purchased electricity only. Additionally, the post-installation documentation should be updated to show the effect of the power purchase agreement incentive as compared to this project's utility incentive.	Program influence	The Wind Turbine is not being considered by the Customer for this location. The PD-2 document was included as part of the 1st discussion that TRC Engineers had with the Customer about all the sites including the [REDACTED]	Thank you for the clarification.
3	In several places, the PFS includes obsolete language possibly from other projects with the customer. For example, page 12 mentions "proposed lighting" but this project does not involve lighting upgrades.	Other 1	Updated.	Thank you.

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.</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
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.