

## CPUC Staff Ex Ante Review

CPUC Staff Project ID Number	PGE_24_T_A_969_PRJ - 04539348_HVAC
CMPA Directory Link	<a href="https://deeresources.info/cmpa/projects/21430">https://deeresources.info/cmpa/projects/21430</a>
PA	PGE
PA Application ID	PRJ - 04539348
PA Application Executed Date	
PA Program ID	PGE_Ag_001
PA Program Name	TRC - Agricultural Energy Savings Action Plan ALSAP Ag - Customized
PA Program Year	
Date of CPUC Staff Review:	2/7/2025
PA CMPA Upload Dates Included in this review:	
First PA Upload	1/14/2025
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-HEAT RECOVERY
Measure 2	
Measure 3	
Measure 4	
Measure 5	
Measure 6	
Measure 7	
Measure 8	
Measure 9	
Measure 10	
PA Project Description:	Steam Recovery on Low Pressure Side of the Paste Production Lines
Bi-Monthly Upload kW Demand Reduction	0.0
Bi-Monthly Upload Annual kWh Impacts	0.0
Bi-Monthly Upload Therm Impacts	114,430.0
PA Proposed Incentive \$ (to Customer)	\$73,822.00
Project Documentation kW Demand Reduction	0.0
Project Documentation Annual kWh Impacts	0.0
Project Documentation Annual Therm Impacts	114,430.0
Project Documentation Incentive \$ (to Customer)	73,822.0
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 NOT Required

Action Number:	Summary of CPUC Staff Required Action by the PA:	Action Category	PA Response	ED Resolution
1	<p>PFS (page 24) states that "The energy savings calculations are based on historical MVR vent valve data for four full production years, 2021 through 2024." However, data from 2023 is currently hardcoded in the savings calculation workbook's "Steam Analysis" tab column D. If valve position and steam venting values are linked to actual data, similarly as with 2021, 2022, and 2024 data, the savings claim is reduced to 108,010 therm. Please correct the savings estimate and revise in the next quarterly upload.</p>	Analysis assumptions		
2	<p>The review team is unable to confirm the appropriateness of the EUL value of 14 years. The PFS (pages 19, 26, 28) states that the source of the 14-year EUL is DEER, but the review team cannot find the referenced measure ID ("CPG00") in the DEER EUL support table. The PA Tech Review document (page 4) states that the measure life is "based on PG&amp;E Solution Code (CPG00)." Please amend the project submittal with supporting information on the source and justification for the 14-year EUL. Note: we are in agreement with the interpretation of E-5221-A host/proxy guidance and use of the AOE's full EUL, but the source of that EUL value is unclear.</p>	EUL/RUL		

Note or Instruction Number:	CPUC Staff Notes or Instructions:	Instruction Category	PA Response	ED Resolution
1	The project is classified as "HVAC" in bimonthly upload data, but it involves a manufacturing process improvement.	Other 1		
2	Production throughput (tons of diced tomatoes and tomato paste) varied notably from 2021 through 2024. Since production will impact the measure's savings potential, the M&V plan should describe in more detail how the post-installation savings calculation will include normalization of pre/post data to reflect typical production.	M&V plan		

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"> <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.