

CPUC Staff Ex Ante Review

CPUC Staff Project ID Number	SDGE 20 C I 424 [REDACTED] Process
CPUC Directory Link	[REDACTED]
PA	SDGE
PA Application ID	[REDACTED]
PA Application Executed Date	01/06/2020
PA Program ID	SDGE3231
PA Program Name	3231 - SW-IND-Calculated Incentives-Calc - (EEBI)
PA Program Year	2020
Date of CPUC Staff Review:	4/16/2020
PA CMA Upload Dates Included in this review:	
First PA Upload	2/26/2020
Second PA Upload	3/17/2020
Third PA Upload	3/25/2020
PA Measure Description(s):	
Measure 1	463202: Process Distribution - ASD/VFD - REA
Measure 2	
Measure 3	
Measure 4	
Measure 5	
Measure 6	
Measure 7	
Measure 8	
Measure 9	
Measure 10	
PA Project Description:	VFD reduced size new compressor
PA Ex Ante kW Demand Reduction	[REDACTED]
PA Ex Ante Annual kWh Impacts	[REDACTED]
PA Ex Ante Annual Therm Impacts	[REDACTED]
PA Proposed Incentive \$ (to Customer)	\$ [REDACTED]
PA Proposed Total Payment to Implementer \$ (not to include the above incentive to customer)	[REDACTED]
CPUC Staff Approved Ex Ante kW Demand Reduction	
CPUC Staff Approved Ex Ante Annual kWh Impacts	
CPUC Staff Approved Ex Ante Annual Therm Impacts	
CPUC Staff Primary Reviewer Name	Jeffrey Davis
CPUC Staff Primary Reviewer Firm	Energy 350
CPUC Staff Review Supervisor Name	Sepideh Shahinfard
CPUC Staff Review Supervisor Firm	SBW Consulting
PA Primary Reviewer Name	Wang, Jessie
PA Primary Reviewer Firm	SDG&E
CPUC Staff Project Manager	Peter Lai
CPUC Staff Policy Authorization (as needed)	
CPUC Staff Recommendation Marked "X":	
	Application ready to proceed without exception
X	Application ready to proceed with exception(s), as noted
	Application rejected.
	Application not ready for review, revised and resubmit as noted

Action Number:	Summary of CPUC Staff Required Action by the PA:	Action Category	Due Date	PA Response	CPUC Response
1	The project involved replacement of a 100hp constant speed compressor with a 15hp compressor equipped with a variable speed drive. Please provide documentation to show that the new equipment is able to meet the equivalent level of service. If the new compressor provides reduced levels of service compared to the baseline, energy savings must be normalized to comparable levels of service.	Eligibility	Within 30 days of this disposition	Based on guidance from the 4/1/2020 SDGE/CPUC CPR Check-in meeting, SDG&E asked the customer's selected vendor to provide an updated simulation using the reduced HP constant speed compressor virtual baseline. A new tab called "Updated Simulation Results" has been added to the excel savings file - "Savings analysis [REDACTED] Compressor040820.xlsx" with updated savings, incentives and SPB. Since this new savings baseline is a "virtual baseline" instead of the trending data baseline, and the savings has been reduced to [REDACTED] with [REDACTED] incentives, we want to ask to switch this measure from M&V method to calculated method.	a. The new 20-hp constant speed compressor baseline is appropriate. If a calculated approach is used to estimate savings, a live calculation workbook that includes input assumptions (e.g., CFM profile, operating hours, baseline efficiency, etc.) is required to show how savings were estimated. b. Please update the cost to incremental measure costs (instead of full measure cost) for installing two (2) 15-hp VFD compressors. c. The original project submission package (see "XXX EEBI_TRWB_v2020.1.00.xlsx" file) shows the same full measure cost for installing one (1) 15-hp VFD compressor. The updated package use the same cost for two compressors. Please clarify how the cost was estimated.

2	AOE measure application type (MAT) is not appropriate for this project. The AOE must not be able to operate on its own. Please update the MAT to the appropriate replacement MAT (NR or AR), provide discussions on how the MAT was determined and updated the baseline accordingly.	Measure type	Within 30 days of this disposition	Based on discussion from the 4/1/2020 SDGE/CPUC CPR Check-in meeting, SDG&E is only counting the savings from the VFDs on the proposed compressors and is therefore using the original measure ID 463202 - Process Distribution - ASD/VFD - AOE.	Per discussion during the meeting on 4/1/2020 and the instruction provided in this disposition, the appropriate measure application type is normal replacement. Please note that an AOE measure installs new equipment onto an existing host improving the nominal efficiency of the host system. The existing host system must be operational without the AOE, continue to operate as the primary service equipment for the existing load, and is able to fully meet the existing load at all times without the add-on component. The AOE must not be able to operate on its own. The actual energy reduction occurs at the host equipment, not at the add-on component, although any add-on component energy usage must be subtracted from the host savings. This definition is from E-4818. E-4818 also directs the PAs to apply a normal replacement baseline where the existing equipment is not operational or not meeting the existing service requirements. This applies to all types of equipment, including add-on equipment. The standard practice baseline in this case should be defined by following 3 steps laid out in E-4939.

Note or Instruction Number:	CPUC Staff Notes or Instructions:	Instruction Category	Due Date
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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. 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>
Application not ready for review, revised and resubmit as noted	The application has deficiency in the supporting documentation and the PA has provided incomplete documentation. The complete documentation has been defined in the Statewide Custom Projects Guidance Document. Please note that this is not a final recommendation from CPUC staff. This recommendation is limited to two requests per application.