CPUC Comments on SWAP011-02 – Vending and Beverage Merchandise Controller

Lead PA: SCE

Workpaper Submittal Date: 12/7/2020

CPUC Review Date: 02/03/2021

CPUC 2nd Review Date: 3/26/2021

Please note responses to comments in the table below, revise workpaper, and upload the entire package to the WPA. If needed, please reach out to Workpaper Review Team to set up a call to discuss.

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| CPUC Comment | PA Response |
| In the Applicable State and Federal Codes and Standards table, in the Code Requirements section, CFR Title 10 Part 431 Subpart Q §431.296 (a) and (b) are listed, but not CFR Title 10 Part 431 Subpart C §431.66 (b) when both are utilized in the savings impact methodology and both are mentioned in the text before the table. | Table revised and applicable code reference and effective date have been included. |
| Please be specific about the requirements for eligibility. There are several vague requirements in the Eligible Products section:  The first bullet under “Beverage merchandise controller (BMC) must:” mentions Shut down the beverage merchandise cooler when occupancy/traffic drops below a **certain threshold**”. Is there a specific/range of threshold that is required for the BMC to be eligible?  Then in the vending machine controller (VMC) requirements, it states “Control logic must periodically power up the machine at **regular intervals**…”. Is there a minimum or range of acceptable interval to power up the machine to maintain product temperature and provide compressor protection? | Updated to make language consistent between BMC and VMC requirements so that specific ranges and intervals are used for both. |
| The energy methodology section describing the UES\_ref BMC, with the maximum daily energy consumption (MDEC) formula; (0.55[8.66 + (0.009 x C)] does not appear to be utilized for the energy savings.  Additionally, the MDEC used to calculate energy savings impacts for “cold vending machine controls”, which uses an MDEC = 0.52 x V + 2.2, is missing from the workpaper document. | The BMC calculations example reference an older standard which is no longer used. Per the issue noted, this section has been replaced with MDEC = 0.052 x V + 2.2 requirement for Class B Beverage Vending Machines for which savings were calculated for in the WP. |
| In the reduction of lighting use section, an effective full load hours per building table should be included. | Table Added |
| In the previous version of the workpaper, there was a table that referenced the refrigerated volumes for each merchandise cooler offerings; both the typical range and the value used in the savings calculation. This table appears to be missing from this version. Please add this table back into the workpaper. | Table Added |
| In the EAD tables, a delivery type of “DnDeemedDI” is used which is not found in PEAR. The ID for downstream direct install delivery is “DnDeemDI”., | Updated |
| Please fix the text explanation prior to the labor cost assumptions table; the text states the rates reflect the miscellaneous labor rate from DEER, when the rates come from RS Means data. | Updated |
| In the EAD tables the Energy Impact - a building location ID of “any” was used, which is not found in PEAR. | Updated |
| In the WP, the measure is for AOE for existing vending/beverage machines. The baseline is an existing vending machine with no controls – this appears to contradict with eligibility requirements. As stated on page 4, the vending machine being installed must be ENERGY STAR-qualified, which must have at least one form of low-power mode. This eligibility requirement seems to conflict with the stated baseline and measure type (AOE). Please address. | Rephrased to state that Energy Star Qualified machines that include a low power mode are not eligible.  3/26/2021 – Revised per comment. |