CPUC Comments on SWPR005-02 Enhanced VFD on Irrigation Pump

Lead PA: PGE

Workpaper Plan Submittal Date: 6/18/2021

CPUC Review Date: 07/01/2021

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 |
| Are adequate annual pump run hours available from the PY2018 and PY2019 small/medium commercial evaluations – in order to update the estimated annual hours of operation parameter? The source for all site-level hour estimates is AMI data serving one or more pumps. | The PY2018 report includes a sample size of 15 Well and 12 Booster Pumps; PY2019 collected data from 45 pumps. For future workpaper updates and to make sure we have a more accurate savings calculations, PG&E recommends a larger and more diversified sample of installed Ag pumps. |
| We would like to discuss the merits of basing the VFD EUL on the remaining useful life of the pump motor. What typically happens to the motor when the pump fails and pump refurbishment is no longer an option? What typically happens to the pump when a motor fails but the pump remains viable? | The approach to measures that include several components with different life cycles, such as the Enhanced VFD, should be revised. A comprehensive method that will include the pump, motor, VFD, and controls should be analyzed.  PG&E opted to request a new motor as part of this program to at least have two of the three main components replaced under this measure. Pumps can fail in many ways, leaky seals and broken impellers are typical. For future workpaper updates PG&E recommends studying how often this happens and what a typical customer do. |
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