|  |  |
| --- | --- |
| CPUC Comment | PA Response |
| Please provide more detail on survey questions to confirm fuel substitution equipment:  **What format**: Telephone, email, through warranty cards, or other?  **How often administered and how will claims be adjusted**: Continuously?  Quarterly and adjust the claims quarterly?  Or Annually?  **Please provide example survey questions.** | **For NR Upstream:**  No survey will be conducted.  **For NR Midstream**:  Survey will be conducted monthly, by e-mail. Sample: “What was the fuel source of the equipment you replaced?”   1. Gas 2. Electric 3. I don’t know/I’m not sure   **For NR, NC, AR Downstream/DI:**  The following data must to be submitted with each project application by the project developer:   1. What is the existing fuel type for the water heater (electric/gas)? 2. Did the site require any electric infrastructure upgrades for the proposed electrification measure? If yes, provide the itemized invoices with infrastructure upgrade costs. 3. Did the owner install any other electrification measures at this site? If yes, list the measures and provide the itemized invoices with infrastructure upgrade costs (if any).   **For AR Downstream/DI:**  Preponderance of evidence (POE) must be documented. The following are the types of information that will be required for all projects:   1. Customer/site information 2. Specifications of existing equipment 3. Proof that water heater is still operating as intended 4. Existing water heater nameplate data with manufacturer date to confirm remaining useful life 5. Replacement water heater information |
| EAD Table and associated workpaper text edits: | 1. Updated to “VersionSource” 2. Updated to “APreWBtherm” 3. Updated to “Description” 4. Updated to “Deem-WP-FuelSub” 5. Updated BldgType from “Any” to “SFm, MFm, and DMo” 6. Based on CPUC email on 12/19/2019, Labor costs and not labor rates is appropriate. No need to change. 7. Updated to “Ex”   8 & 9) Revised Cost ID and Use Categories to match standard. |
| How is calculation for NC completed if the calculator does not have NC as an option? | In fuel substitution calculator, NC is treated the same as NR. |
| Were AR calculations completed in the calculator? | Yes, AR calculations assume the same baselines as the NR measure. As specific baselines are required for each NR case, this was viewed as reasonable. |
| Why are there no low draw patterns in the base cases described? | Base cases use the same values that were used in the previously approved workpapers. Those only used medium and high draw patterns. |
| Does the baseline for upstream/ mid-stream based on RASS include a weighted average for size and draw pattern (first hour ratings?) | SCE’s proposal is to leverage RASS to adjust energy savings claims. SCE does not intend to change the base case assumptions in the workpaper. In the workpaper, upstream baselines are assumed to be the same as downstream measures. It was assumed that the program administrator would need to justify the baseline that would be relevant to their program. For example, SCE adopted 40-gal storage baseline based on the US EIA “Updated Buildings Sector Appliance and Equipment Costs and Efficiencies, Appendix A” from 2018, which states that typical unit sizes are 40 gallons. (see attached below) |
| Is the HPWH first hour rating the same for the base case gas water heater? | All base case equipment values were found directly from DEER WH calculator v3.4 for all water heaters, except for 60 gal and 70 gal storage WHs which used values from v3.2. This includes assumptions based on FHR/Draw pattern and associated formulas for calculating UEF. |

CPUC Comments on SWWH025-01: HPWH

Submittal Date: 12/18/2019

Attachment:

