CPUC Comments on SWWH027-01 HPWH Com, Fuel Substitution 080520

Lead PA: SCE

Workpaper Submittal Date: 08/05/2020

CPUC Review Date: 08/20/2020

SCE Response: 09/09/2020 & 09/25/2020

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| CPUC Comment | PA Response |
| SWWH027G and SWWH027H have the same savings impacts for the first baseline period as the second baseline periods (for AR measures).  All other measure offerings appear to have slightly different savings impacts for each baseline period as expected. Is there a reason the savings are the same, if not please revise savings accordingly. | See response “A” |
| Additionally, all AR measure costs appear to be the same as the NR/NC measure offerings.  AR measure costs should be full measure cost adjusted by the cost that would have incurred to install the standard practice second baseline at the end of the RUL. | See response “B” |
| The technology summary section is confusing. The way the section is written, it sounds like Heat pump has two electric elements, which heat cold incoming water? | See response “C” |

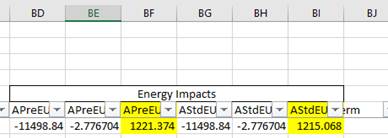
Please note responses to comments in the table below, revise workpaper, and upload the entire package to the WPA. If needed, please reach out to Workpaper Review Team to set up a call to discuss.

PA Response:

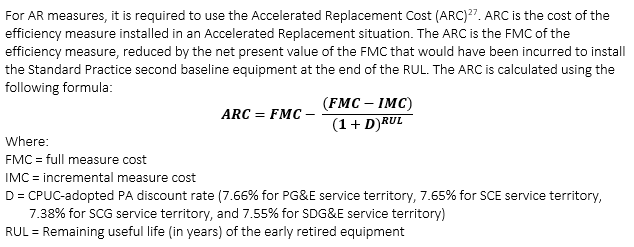
1. Per SCE-CPUC call on 9/4/2020, a discussion regarding rounding methodology in the Water Heater Calculator was ruled to be consistent with all earlier versions of the calculator. Hence, v.4.1 of the calculator will not require any fixes.

It is found that the values between first and second baseline period are very nearly equal for AR measures proposed. For example (see screenshot below): a 30-gallon, medium-draw, 0.6-UEF water heater (standard) and a 30-gallon, 0.57-EF to 0.61-EF water heater (pre-existing) at a university dormitory in CZ01 will both have therm savings of 1220 (actual Energy Impact: 1221 and 1215). Due to rounding, the two energy looks equal. This can be expected for all AR measures. Hence, no changes made on the workpaper to address this comment.





1. Per CPUC and SCE discussion on 9/1/2020 regarding Accelerated Replacement Cost, it is agreed that the language in the Statewide Deemed Workpaper Rulebook to be included in the cost section to clarify AR measure cost adjustments. Section Measure Case Material Cost (and Measure Case Base Cost) is updated with the excerpt as follows:



1. Section updated for clarity:

“Domestic water heaters are pressure vessels that transfer heat to water. The heater may heat the domestic water using a heat exchanger that works like an instantaneous water heater with an integral tank and heat exchanger. Heat pump water heaters use a direct expansion (DX) heat pump to transfer heat to the water. Heat pump water heaters achieve higher efficiency compared to electric-resistance or natural gas water heaters and are typically equipped with supplemental electric-resistance elements for periods of high demand.”

Additional SCE Comment:

* Per CPUC request on 9/1/2020, SCE will update the implementation date to 10/26/2020 to align with the 25-day review period required by CPUC.
* As of 9/30/2020, this workpaper has been updated due to savings update from the new Water Heater Calculator v4.2.