CPUC Comments on SWAP003-03 Clothes Dryer, Residential

Lead PA: PGE

Workpaper Submittal Date: 12/21/2020

CPUC Review Date: 1/27/2021

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| CPUC Comment | PA Response |
| Page 7 of the workpaper states: “IOUs shall evaluate ENERGY STAR Most Efficient (tier) criteria in an annual basis and facilitate updates to the workpaper as needed to align workpaper (tier) requirements to ENERGY STAR.”  However, CPUC policy is to limit workpaper updates to ensure stability in offerings.  CPUC reviewers interpret this to mean that annual updates will be made to the qualified products list. CPUC reviewers encourage this, as long as the workpaper is written in such a way that annual updates do not result in workpaper revisions. Please confirm that is the case. | Confirmed, this language is removed from the word doc and replaced with, “Data collection requirements are to be determined” in order to limit workpaper updates to ensure stability in offerings. |
| Page 21 of the workpaper lists the EUL of Energy Star Advanced Tier (i.e., heat pump) dryers as 0.70, which assumes this measure class has been offered for less than two years. Please confirm whether or not that is the case. If this class of measures has been offered for more than two years then an alternative NTG ratio would be applicable. | Confirmed, this NTG ID was added by SCE in rev. 02 in April 2020 and approved on October 2020 which is less than two years. |
| The workpaper sets the GSIA to a default value of 1.0. However, it is notable that the dryers will be sold, in-part, through upstream (or likely midstream) channels. There are at least two potential issues with this: 1) the dryers may not be sold to IOU customers (or otherwise installed in a facility served by an IOU meter) and 2) the dryers may not be put into service right away – could just go into storage somewhere in the supply chain. If sales are mostly midstream then likely only issue 1) above is relevant. What concerns, if any, does the workpaper team have regarding these considerations, and might it justify a different GSIA value? Are there evaluation results available (or other sources), perhaps for other equipment being sold through upstream or midstream channels, that might be used to support a non-default GSIA value? | IOUs currently do not have any plan for GSIA studies, and past EM&V evaluations were reviewed to confirm there is no recommendation to update GSIA value from 1.0. If there is a need to update, it should be recommended as part of the future CPUC sponsored IE studies. |

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.