CPUC Comments on SWWH006-06 Tankless Water Heater, Commercial

Lead PA: SCG

Workpaper Submittal Date: 9/20/2021

CPUC Review Date: 10/01/2021

SoCalGas Response Date: 10/15/2021

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 “Base case description” section, there is a “base case specification table” that defines base case technologies. Please mention the sources of these descriptions and the differences in pre-existing and standard/code technologies for the large instantaneous water heater 0.80Et/0.90Et (DEER2014) and 0.96Et (DEER2021 DWHC v.4.2a) base case descriptions. The descriptions listed in the table currently describe the DEER2021 (DWHC v.4.2 and v.4.2a) but not the DEER2014.  These requested additions can be added in the table descriptions or footnotes. | DEER2021 the base case inputs are very clear as part of the calculator. DEER2014 base case is not very well defined other than the thermal efficiency and the standby losses. Added the requested clarifications. |
| The DEER Difference Summary table (located in the DEER Differences Analysis section) requires updates.  Specific areas that need addressing:  DEER Difference Summary   * Modified DEER Methodology should = No * Scaled DEER measure should = No * DEER version –   + DEER2014 for SWWH006C and SWWH006D   + DEER2021 (DWHC v.4.2) for SWWH006A, SWWH006B, and SWWH006D   + DEER2021 (DWHC v.4.2a) for SWWH006F * Reason for Deviation from DEER should = “None” * DEER Run and Measure IDs should be updated. Remove the “scaled” measure ID and replace with NG-WtrHt-LrgInst-Gas-gte200kBtuh-lt2G-0.96Et | Done. |
| Regarding the “Eligible Products” subsection under “Program Requirements”:   * SWWH005-04 and SWWH006-06 should have nearly identical criteria. Include language from SWWH005 about emissions limits | Done. |
| SWWH005-04 and SWWH006-06 were reviewed together and have some overlapping comments, primarily around eligibility and definitions of the technologies (boilers, instantaneous, and tankless). From some comments in the SWWH005-04 review, you may need to refer to SWWH006-06 for context. | Done. |