

CPUC Comments on SWWH025-02: Residential Heat Pump Water Heater – Fuel Substitution

Lead PA: SCE

Workpaper Submittal Date: 06/15/2020

CPUC Review Date: 06/25/2020

CPUC Comment	PA Response
<p>Please include the following text under the Implementation Eligibility table as is customary with all fuel substitution workpapers:</p> <p><i>Required Documentation for Normal Replacement in Upstream and Mid-Stream Delivery</i></p> <p>Please note that new construction (NC) is not supported nor offered through Upstream delivery channel. New construction measures are only eligible for downstream application under the following conditions. These are defined as new services in fuel substitution technical guidance <small>(add reference)</small>.</p> <ul style="list-style-type: none"> • measures are installed in new areas of an existing building, • measures are installed in a major renovation of an existing building, or • measures are installed in capacity expansions of existing systems to serve existing and/or new load retrofits that require a new energy service. <p><i>Required Documentation for Normal Replacement in Upstream and Mid-Stream Delivery</i></p> <p>For upstream/mid-stream delivery method, the participant baselines are unknown and the spillover effects are unknown. The manufacturer or distributor doesn't know whether the purchased measure is replacing a gas or an electric baseline appliance. Claimed savings for these delivery types will be adjusted using the ratio of baseline gas appliance to total baseline appliances. These ratios will be determined from Commercial Food Service Technologies Participant Study⁹. The implementer shall survey 10% of the mid-stream installations, to determine actual gas/electric baseline proportions, and the program administrator shall adjust claimed savings based upon these survey results." This survey will be conducted annually and sample survey questions are as follows:</p> <p>⁹ "What was the fuel source of the equipment you replaced?"</p> <ol style="list-style-type: none"> a. Gas b. Electric c. I don't know/I'm not sure 	<p>Workpaper revised. Reference to Commercial Food Service Technologies Participant Study not incorporated. Residential measures are more appropriately characterized in the Residential Appliance Saturation Survey (RASS).</p>

<p>In addition, for mid-stream delivery method, the implementer should provide the retailer or distribution location where the product was sold, rated capacity, and proposed building type where the product will be installed.</p> <p>A survey will not be issued for upstream delivery method.</p> <p><i>Required Documentation for Normal Replacement, New Construction, and Accelerated Replacement in Downstream and Direct Install Delivery</i></p> <p>For downstream deemed and downstream direct-install delivery types, in addition to the standard information such as building type, climate zone, and capacity of the units, the following data must be submitted with each project application by the project developer:</p> <ul style="list-style-type: none"> • • What is the existing fuel type for the existing equipment? • • Did the site require any electric infrastructure upgrades for the proposed electrification measure? If yes, provide the itemized invoices with infrastructure upgrade costs. • • 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). 	
<p>Please include the following text under the Eligibility Requirements table as is customary with all fuel substitution workpapers:</p> <p><i>Incentive Requirements</i></p> <p>Deployment of the program may require rebates or financial incentives to participants that exceed the Incremental Measure Cost (IMC).¹ Incentives or rebates that exceed the incremental cost for a measure must be justified by individual PAs in addendum to workpaper submissions to document program implementation practice prior to program implementation.</p> <p>¹ Originally defined in D.92-09-080, the dual test was last modified in D.05-04-051</p>	<p>Workpaper revised.</p>

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 Deemed Review Team to set up a call to discuss.