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PROJECT NO. 38578

ENERGY EFFICIENCY § PUBLIC UTILITY
IMPLEMENTATION PROJECT § COMMISSION OF TEXAS
UNDER 16 TAC § 25.181 §

COMMENTS OF ARMADA POWER, LLC

Senate Bill 1699 passed earlier this year during the 88th Regular Session of the Texas Legislature provides that transmission and distribution utilities required to offer an energy efficiency incentive program under Texas Utility Code Section 39.905 can use 10 percent of the budgeted spending for residential demand response. The Technical Reference Manual (TRM) contains the deemed energy savings for residential measures used to comply with the energy efficiency programs implemented by the electric utilities to reduce energy consumption or cost, but it does not fully include residential demand response control technologies.

Armada Power, LCC requests that the Public Utility Commission of Texas (PUCT), working through the Energy Efficiency Implementation Project (EEIP, Docket 38578) take action to fully include residential demand response (DR) control devices in the TRM.

Armada Power creates a device manufactured in the United States that can be retrofitted onto any electric resistance water heater to manage the charging. An aggregation of retrofitted residential water heaters can respond to the energy demands and associated needs of the grid in a measurable manner. Each individual device can shift approximately 1 kW with a maximum of 4.5 kW and avoid approximately one ton of carbon annually by avoiding peak demand.

Load shifting using DR devices such as hot water tank controllers enables residential customers to reduce energy demand and cost. Texas utilities that offer DR programs to their customers create a virtuous cycle of stable rates, customer comfort, and efficient peak load reductions. Since SB 1699 formalizes that utility funds can be used for residential DR it is therefore important to update the TRM and fully include residential demand control devices as well as demand-based measurements into the document.

Respectfully submitted,

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