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**PUBLIC UTILITY COMMISSION
OF TEXAS**

**COMMENTS OF THE SOUTH-CENTRAL PARTNERSHIP FOR ENERGY
EFFICIENCY AS A RESOURCE (SPEER)**

NOW COMES the South-central Partnership for Energy Efficiency as a Resource (“SPEER”), and files these comments in response to the Commission staff request for written comment filed in this proceeding on October 10, 2022.

Introduction

The South-central Partnership for Energy Efficiency as a Resource (SPEER) is a 501(c)(3) non-profit regional energy efficiency organization (REEO). We are one of six in the country that aims to accelerate the adoption of advanced building systems and energy efficient products and services throughout the nation. We work collaboratively to strengthen local economies, improve health and quality of life, and improve the environment

Comments

The Technical Reference Manual (TRM) is an invaluable reference for determining energy and peak demand savings estimates from energy efficiency programs. SPEER applauds the continued efforts by the Public Utility Commission of Texas (PUCT) staff, the Evaluation, Measurement, and Verification (EM&V) contractor, and stakeholders to develop the comprehensive TRM Version 10.0. SPEER submitted suggested additions to the TRM in the initial call from PUCT and EM&V staff in the Spring of 2022. These additions focused on consideration of variable speed heat pump efficiencies. The recommendation was developed in coordination with a SPEER facilitated heat pump working group of manufacturers and implementers that identified

the lack of savings measurements for the technology. SPEER appreciates the EM&V contractors' engagement with stakeholders and their recognition that these additional savings are justified. Additionally, we understand that more data and methodology is needed before including the measurements in future versions of the TRM. SPEER commits to working with the ongoing heat pump working group, PUCT and EM&V staff, and other stakeholders to assist in identifying necessary information so that future recommendations may be considered in future TRM updates.

Conclusion

SPEER appreciates your consideration of the important issues discussed in these comments and stands ready to participate as the proceeding moves forward.

Respectfully Submitted,

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