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PROJECT NO. 56768

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

COMMENTS OF ENERCHOICE LLC FOR CHANGES TO THE PY 2026 TECHNICAL
REFERENCE MANUAL (TRM 13)

Sales data from HVAC manufacturers provided in 2024 show that approximately four out of five new apartments are still being built with AC/electric resistance heat systems (gas is rare in this market). These electric resistance heating systems are likely to be in place for the next twenty years. This should be an immediate concern for ERCOT and the State of Texas.

The current heating baseline for new construction is 7.5 HSPF:

Table 29. Central and Mini-Split HPs—Baseline Efficiencies

Project type	Cooling mode	Heating mode
New construction, split heat pumps	14.3 SEER2	7.5 HSPF2
	11.7 EER2	

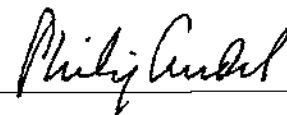
If a separate heating baseline for multifamily new construction were to be adopted, then utilities could incentivize the installation of heat pumps in place of these AC/electric heat systems. This baseline could be based on the current market shares for resistance heat and heat pumps.

Alternatively, the 3.412 resistance heat baseline could be adopted, along with an appropriate Net-To-Gross (NTG) ratio. The amount of the incentive that would be required to shift developers from AC/electric heat systems to heat pumps in these projects would likely be lower than is currently required for retrofit projects.

A baseline study would provide additional market data to support the proposed change.

There is a window of opportunity that closes quickly during the design and construction phase of these projects, and a market intervention strategy to take advantage of this opportunity could greatly benefit the State of Texas.

Respectfully Submitted,



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