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April 29, 2025

Ramya Ramaswamy

Director of Energy Efficiency, Energy Efficiency Implementation Project, Public Utility Commission of Texas

Re: Comments on TRM for Program Year 2026, docket number 56768

Dear Ramya:

Daikin Comfort Technologies North America, Inc ("DNA") appreciates the opportunity to comment on the Energy Efficiency Implementation Project ("EEIP").

Daikin Industries, Ltd. (DIL) is a Fortune 1,000 company with more than 95,000 employees worldwide and is the world's #1 indoor comfort solutions provider. Daikin Comfort Technologies North America (DNA) is a subsidiary of DIL, providing Daikin, Goodman, Amana® and Quietflex branded products. DNA and its affiliates manufacture heating and cooling systems for residential, commercial, and industrial use and are sold via company owned distribution or independent distributors and contractors. DNA's headquarters is located at the Daikin Texas Technology Park (DTTP), a 4.2 million-square-foot, state-of-the-art facility on a 497-acre campus in Waller, Texas. Approximately 8,000 people work at DTTP and Daikin employs approximately 10,000 people in Texas.

DNA has participated in the EEIP for the last two years and we have identified three areas we would like to address in working groups for the program year 2026:

- 1) The baseline condition in the TRM for new multifamily new construction assumes that a heat pump is used. Our research has determined that, for many years, approximately 80% of multi-family new construction housing projects have been built using electric resistance heating as a primary or sole heat source. DNA supports conducting research such as a building stock assessment for multifamily construction, to support the creation of a baseline condition that reflects what is happening in the market today.
- 2) DNA requests continuation of the Heat Pump Working Group ("HPWG"). A topic we request the HPWG explore is the potential of the controller used by inverter heat pump and air conditioning) systems (much like a thermostat) to participate in smart thermostat savings measures. Due to the different way inverter controllers operate, they do not conform to the embedded assumptions of the existing measures 2.2.8 and 2.2.9 while still delivering comparable overall savings.
- 3) Finally, DNA requests that the heat pump working group continue discussions aimed at improving the inverter HP and AC savings algorithms. Due to the challenging and pioneering nature of this work, we feel that it is important to continue discussions. Daikin has research it can contribute to the working group that highlights some of the inconsistencies still in need of remedy with the algorithm. We hope utility members can also share data and findings to enrich the effort to improve the algorithms.

If you have any questions regarding this submission, please do not hesitate to contact me.

Sincerely,

Kurt Heim

Vice President, Environmental Advancement

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