Filing Receipt

Filing Date - 2025-04-30 09:25:25 AM

Control Number - 56768

Item Number - 12

Recommendation for Inclusion of OpenDSM in Program Year 2026 Texas Technical Reference Manual (PY 2026 TRM)

To the Staff of the Public Utility Commission of Texas,

We encourage the PUCT to expand the TRM language to clarify where open-source tools like OpenDSM[1] (formerly OpenEEmeter) can be applied. Specifically, OpenDSM should be explicitly identified as an approved method for calculating energy savings across all measures and as a tool for determining incentive payments under pay-for-performance programs. This would ensure transparency and consistency in program evaluations and incentivization.

OpenDSM offers standardized, transparent, open-source approaches to measuring energy efficiency savings and impacts from other DER interventions. These methods will enhance accuracy, consistency, and reliability across energy efficiency programs throughout the state, providing a solid framework for assessing the effectiveness of various measures and initiatives. It is worth noting, OpenDSM's OpenEEmeter models are the first, and currently only, DOE-approved open-source software to deploy measured HOMES IRA programs as approved by the National Renewable Energy Laboratory (NREL).

The benefits of open-source measurement are not limited to pay-for-performance initiatives. Embedding measurement and verification (M&V) capabilities into all programs enables Texas to monitor progress, optimize performance, and meet state reporting requirements. This approach facilitates the archiving and retrieval of program-level data for evaluations while providing administrators, utilities, and the PUCT with timely insights for decision-making and program improvement. By incorporating advanced analytics and feedback mechanisms, programs can continuously adapt based on real-world outcomes, creating a more resilient and effective energy efficiency framework that aligns with PUCT's long-term goals.

Embedded M&V also allows program implementers to track realization rates and address performance issues during implementation. This ensures that programs meet the expectations of administrators and customers while providing an added layer of accountability. Additionally, it delivers value to regulators and utilities by enabling the tracking of value delivered to the system and to customers, ensuring that programs align with broader system and customer benefits.

Since OpenDSM is non-proprietary, the PUCT can mandate that utilities in Texas adopt it by reference in all of the solicitations they release, requiring bidders to demonstrate how their solutions incorporate its methods and code base. This approach ensures comparability between bids and consistency in evaluation methods at the state level. Furthermore, the PUCT could procure a comprehensive software solution that integrates OpenDSM for

[1] https://lfenergy.org/projects/opendsm/

accurate and transparent rebate calculations while offering additional features such as program optimization and secure data management across all of its programs.

By leveraging OpenDSM as a foundational tool, the PUCT can create a reliable, transparent framework for measuring energy savings and driving efficiency and accountability in its programs, while promoting consistency and transparency in regulatory oversight to ensure trust and clarity for all stakeholders.

We welcome the opportunity to discuss or clarify our responses to these questions as the process continues.

Respectfully Submitted,

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