

## **Filing Receipt**

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- **To:** Texas Electric Utilities and the Energy Efficiency Implementation Project
- Cc: Ramya Ramaswamy, Public Utility Commission of Texas (PUCT); Lark Lee, Tetra Tech
- *From:* Noah Oaks, South-central Partnership for Energy Efficiency as a Resource (SPEER)
- Date: April 30, 2025
- Subject: Technical Reference Manual for Energy Efficiency, Docket Number 56768 SPEER Heat Pump Work Group Comments

## INTRODUCTION

Electric utilities are required to use the deemed savings petition process for new measures. Approved measures will then be incorporated into the next annual update of the Technical Reference Manual (TRM). The Public Utility Commission of Texas (PUCT) has solicited a request for stakeholder input on potential recommendations for updates to the TRM to be submitted by May 1, 2025. Utilities and stakeholders submit petitions for new measures to the EM&V team for review prior to filing the petition.

The South-central Partnership for Energy Efficiency as a Resource (SPEER) is a 501(c)(3) nonprofit 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, services, and policies throughout the nation. We work collaboratively to strengthen local economies, improve health and guality of life, and improve the environment.

Since 2020, SPEER has facilitated a working group of manufactuerers and implementers focused on heat pump adoption throughout the region. This group seeks to identify policy barriers, communications and training challenges, and opportunities for greater deployment of the technology. We are very grateful for the PUCT and its EM&V contractor to review our previous TRM update recommendations for a separate all-climate variable speed heat pump metric. We believe the PUCT HPWG and the new metric derived from the groups work was an important first step in addressing the need for Texas to reduce residential load through more efficient technologies.

The memo serves as a recommendation submittal for your consideration for a continuation of the PUCT HPWG with additional review of the new all-climate variable speed heat pump metric and futher research inquiries.

## RECOMMENDATIONS

The TRM defines deemed and partially deemed savings calculations for investor-owned utilities (IOU) to ensure consistent reporting of energy and demand savings. The energy efficiency industry continues to grow in its capabilities and capacity. As a result it is imperative that a diverse group of stakeholders continue to be involved in the update process as new measures are defined and savings are realized. As a result, we would respectfully recommend a



continuation of the PUCT HPWG as its members represent an important sector of the Texas load profile, namely residential heating and cooling consumption. We believe that this group will be necessary to continue refining the variable speed heat pump metric in 2.1.1 of the TRM so that deemed savings from the systems are the most accurate measurements for these highly efficienct systems. Reconvening the PUCT HPWG will provide opporunties for information sharing, transparency in the TRM update process, and better overall data from a robust set of stakeholders deeply involved in the heat pump space.

We recommend that the PUCT HPWG also research and begin developing a new construction multi-family baseline efficiency standard for central and mini-split heat pumps in 2.2.2 of the TRM. Currently, the baseline for new construction does not delineate between single-family and multi-family dwellings and assumes a heat pump is used in these multi-family projects. See Table 29 from the TRM below. However, some estimates show roughly 80% of multi-family projects using resistance heating systems. A new building stock assessment for multi-family construction in Texas should be considered by the PUCT and EM&V to address the discrepancies. And, if needed, addition of a new baseline should be included in future TRM update cycles.

Project type	Cooling mode	Heating mode
New construction, split heat pumps	14.3 SEER2	7.5 HSPF2
	11.7 EER2	
New construction, packaged heat pumps	13.4 SEER2	6.7 HSPF2
	10.9 EER2	
Replace-on-burnout, split heat pumps	13.7 SEER2	7.5 HSPF2
	11.2 EER2	
Replace-on-burnout, packaged heat pumps	12.8 SEER2	6.7 HSPF2
	10.4 EER2	

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

Lastly, we recommend the PUCT HPWG review the potential of systems used to control new all-climate variable speed heat pump systems and how they may participate in smart thermostat savings programs. The assumptions for these programs do not comform to existing measures within the TRM due to how the inverter systems operate. Development of a specific savings calculation for inverter heat pump and air conditioning smart controllers may be necessary to address these underlying assumptions and determine savings.

We appreciate this opportunity to submit this general request for consideration of recommendations that are specific to heat pump measures to be considered for PY2026.



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