



Filing Receipt

Filing Date - 2024-09-25 12:37:47 PM

Control Number - 56966

Item Number - 6



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September 25, 2024

Public Utility Commission of Texas
Central Records
1701 N. Congress Ave
Austin, TX 78701

Re: Project No. 56966 - Goal for Reducing Average Total Residential Load in the ERCOT Region.

COMMENTS OF AARP

AARP is the nation's largest nonprofit, nonpartisan organization dedicated to empowering people 50 and older to choose how they live and age. With a nationwide presence, including 2.5 million members in Texas, AARP strengthens communities and advocates for what matters most to families: health security, financial stability, and personal fulfillment. With a substantial percentage of AARP's members living on fixed or limited incomes or struggling to make ends meet, a priority for AARP is to protect consumers from unreliable power and utility expenses that may endanger their health and financial stability.

AARP Texas wishes to comment on this matter. Given the growing power demands in Texas, this innovative approach has much potential. We are supportive of the effort and urge the Commission to move quickly on the matter. Our specific comments are as follows:

d) Responsive Device Program-... "Program that offers an incentive to residential customers with smart responsive appliances or devices to reduce electricity consumption during an ERCOT peak demand period."

AARP Comment: The program should focus on reduction in electricity consumption throughout the entire year, not just during an ERCOT peak demand.

(2)(c): "program does not adversely impact the needs of a critical care residential customer or chronic condition residential customer as those terms are defined in 425.497 of this title, relating to Critical Load Industrial Customers, Critical Load Public Safety Customers, Critical Care Residential Customers, and Chronic Condition Residential Customers".

AARP Comment: We appreciate that they are thinking about those customers that need continuous access to electricity for medical or essential equipment and are mindful that that includes those living in a single-family home, but also facilities like nursing homes and assisted living facilities.

Program participants:



Programs may want to target low to fixed income and energy burdened households, which requires REPs to be more thoughtful about outreach.

Reporting:

Reporting to the PUC should include how REPs are addressing barriers to connecting with these populations and their participation in the program. Specifically, programs need to think through participation of:

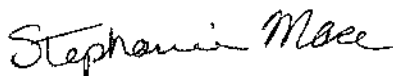
- Renters. A sizable percentage of Texas households – at around 40% - are renters. There will be unique challenges for renters participating – such as when the landlord, owner, or property management company holds the account with the REP, or if the tenant must get written approval from an absent landlord to replace a meter or appliance.
- Those without internet. In 2022, almost 2.8 million Texas households and 7 million people lacked broadband access (U.S. Census), and vast rural areas are especially underserved.
- Maximize opportunities to low/fixed income households by partnering with other programs, projects or funding opportunities that also address residential load reduction and complement these efforts – like weatherization, whole-home retrofitting, or other energy efficiency opportunities.
- Those uncomfortable using new technologies. Trust and privacy concerns remain a barrier, preventing older adults from adopting broadband and new technologies, which could limit participation within these programs unless there is a concerted effort to educate prospective participants on the technology.

(d) Average total residential load reduction goal. (3) “The average total residential load reduction goal is 0.25, unless the commission adopts an updated goal under subparagraph (C) of this paragraph.”

AARP Comment: There is some confusion on the specifics of the goal (i.e., is this 25%?) so additional clarification would be helpful,

AARP appreciates this opportunity to comment. We look forward to further comments once specific proposals are developed.

Best wishes,



Stephanie Mace
Associate State Director, Advocacy and Outreach
AARP-Texas