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PROJECT NO. 57743

REVIEW OF ENERGY EFFICIENCY § PUBLIC UTILITY COMMISSION OF
§
SUBSTANTIVE RULES § TEXAS

COMMENTS OF ENERCHOICE, LLC

The Public Utility Commission Staff has requested feedback from interested parties on several topics relating to the Commission's energy efficiency rule, 16 Texas Administrative Code (TAC) § 25.181, including changes to be considered when calculating cost-effectiveness.

Regarding the calculation of the avoided cost benefits, 16 Texas Administrative Code (TAC) § 25.181(e)(5) specifies that "an escalation rate of 2% shall be used."

The Energy Efficiency Cost Recovery (EECRF) calculation in section 16 Texas Administrative Code (TAC) § 25.182 (d)(7)(C) specifies that "...residential and commercial cost caps shall be calculated to be the prior year's cost caps increased or decreased by a rate equal to the most recently available percentage change in the South urban CPI, as determined by the Federal Bureau of Labor Statistics."

EnerChoice believes that adopting the escalator based on the change in previous year's increase or decrease in South urban CPI into § 25.181 will provide a more accurate cost effectiveness calculation and will increase the standardization of calculations across the Energy Efficiency Rule and the Energy Efficiency Cost Recovery Factor rule.

Dated: March 20, 2025

Respectfully submitted,



Phil Aude

Principal

EnerChoice, LLC