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AHAM Comments on Docket No 25-FDAS-01

Please see the attached document.

Additional submitted attachment is included below.

December 12, 2025

By E-mail

Mr. David Hochschild
Chair
California Energy Commission
Docket Unit
Docket No. 17-AAER-12
715 P Street, MS-4
Sacramento, CA 95814
Docket@energy.ca.gov

Re: AHAM Comments on CEC's Request for Information on Flexible Demand in California for Battery Energy Storage; Docket No. 25-FDAS-01

Dear Chair Hochschild:

The Association of Home Appliance Manufacturers (AHAM) respectfully submits the following comments to the California Energy Commission (CEC or Commission) on its Request for Information on Flexible Demand in California for Battery Energy Storage; Docket No. 25-FDAS-01.

AHAM appreciates the opportunity to comment on the Request for Information regarding a potential Flexible Demand Appliance Schedule (FDAS) for Residential Battery Energy Storage Systems. We urge the Commission to further clarify the scope to exclude individual energy storage units, which are integrated into an appliance. Many home appliances are already covered by U.S. Department of Energy (DOE) energy conservation standards and without a clear definition of "individual energy storage units," the FDAS may affect those regulated appliances that have large batteries. Therefore, AHAM urges CEC to make following revisions:

- Explicitly list large appliances with integrated batteries as "out-of-scope" devices; and
- Further clarify the scope of the rulemaking by defining "individual energy storage units."

I. CEC Should List Home Appliances With Integrated Batteries As Out-Of-Scope Devices In Its FDAS Process For Battery Energy Storage Systems.

This Request for Information is part of CEC's effort to develop flexible demand schedules for a range of appliances, which is a tool to support the alignment of electric demand with clean energy production to avoid greenhouse gas emissions and to enhance grid reliability. CEC has

stated that its goal is to meet at least 7000 MW of flexible load by 2030, with at least 3000 MW expected to be enabled by FDAS or similar load flexibility standards.

AHAM supports CEC in its efforts to pursue energy efficiency improvements for California residents. We support federal energy conservation standards for home appliances that do not eliminate important product features or safety-related functions. In this case, however, it does not make sense for home appliances with integrated batteries to be included in the scope of the FDAS for battery energy storage systems because these battery systems are integrated into an existing product and, therefore, inherently cannot be as flexible through stored power sharing as a home battery system like an electric car charging station or wall mounted battery pack.

Importantly, stakeholders are already working on an update to UL 858, the consensus standard for household ovens and ranges, that would allow larger capacity batteries as an integrated battery. Other appliances with integrated batteries may follow. Appliances with integrated batteries are not being treated separately with a new safety standard but as supplements to the current safety standard. Separate, sweeping energy efficiency regulations could affect existing safety standards for a wide variety of products and the current work to update them accordingly.

Furthermore, including appliances with integrated batteries in the FDAS for battery energy storage systems would complicate the revised mandatory federal cooking top energy test. Cooking tops or cooking top components of ranges, are required to test using Appendix I1 to Subpart B of Part 430, Title 10 of the U.S. Code of Federal Regulations and, starting in 2028, must meet energy conservation standards. The additional standby energy that may be associated with FDAS was not accounted for in development of the test procedure or conservation standards. Home appliance manufacturers are actively working to meet the 2028 cooking top efficiency requirements and additional design burden to meet FDAS will impede this progress. If other appliances covered by federal energy conservation standards also integrate batteries, their power assessment would be part of their appendix in Subpart B of Part 430, title 10 of the CFR.

Including these products in the scope of the proposed FDAS would add unnecessary regulatory burden, would not likely achieve energy savings goals, and could impede innovation. Given the anticipated changes to the consensus standard for residential ovens and ranges and the unique characteristics of appliances with integrated batteries that have a capacity between 5kWh and 20kWh, CEC should list household appliances with integrated batteries as out-of-scope in the proposed FDAS for battery energy storage systems.

II. CEC Should Clearly Define Individual Energy Storage Units To Avoid Inadvertently Including Unrelated Products In The Scope of This FDAS.

AHAM urges CEC to further clarify the scope of this FDAS proposal to include not only a definition of residential battery storage systems but also provide a clear definition of individual energy storage units. Right now, the proposed FDAS does not define individual energy storage units, which results in appliances with energy storage capacity between 5kwh and 20kWh being, we believe, inadvertently, swept into the scope of this FDAS.

A clear definition of individual energy storage units, which excludes appliances with integrated batteries, would provide CEC with a specific range of devices within the broader class of battery energy storage systems and provide stakeholders with the clarity they need to comply with the FDAS appropriately.

AHAM appreciates the opportunity to submit these comments on CEC's Request for Information on Flexible Demand in California for Battery Energy Storage Systems and would be glad to discuss these matters in more detail should you so request.

Respectfully Submitted,

A handwritten signature in black ink, appearing to read 'M. Birkhead', with a stylized, flowing script.

Meredith Birkhead
Regulatory Affairs Manager

About AHAM: AHAM represents more than 150 member companies that manufacture 90% of the major, portable and floor care appliances shipped for sale in the U.S. Home appliances are the heart of the home, and AHAM members provide safe, innovative, sustainable and efficient products that enhance consumers' lives. The home appliance industry is a significant segment of the economy, measured by the contributions of home appliance manufacturers, wholesalers, and retailers to the U.S. economy. In all, the industry drives nearly \$200 billion in economic output throughout the U.S. and manufactures products with a factory shipment value of more than \$50 billion.