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Additional submitted attachment is included below.

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March 5, 2018

Bonneville Power Administration (BPA) appreciates the opportunity to comment on the California Energy Commission (CEC)'s 45-day language for 2019 Title 24, Part 6, Building Energy Efficiency Standards Rulemaking. BPA particularly commends the CEC on setting mandatory requirements for demand management and demand responsive controls.

BPA has long been working to enable and mature open and physical port communication for demand response in water heaters. BPA further understands the importance of having national homogeneity when it comes to demand response communication protocols and it is for this reason that we endorse the NRDC Comments on the 2019 Building Energy Efficiency Standards 45-Day Language Lead Commissioner Hearing ("NRDC 45-Day Language Hearing Comments") as well as offer comment on the CEC's 45-day language for 2019 Title 24, Part 6, Section 110.12. The NRDC specification is robust and suggests important requirements that will have a significant impact on decarbonization efforts. BPA would particularly like to ensure the language covered in the NRDC 45-Day Language Hearing Comments § 3.2 (a)-(b) is implemented as-is. The language states:

- (a) The load management functionality must be accessible to any third-party through a communication interface, physically located on the electric water heater system.
- (b) The communication interface must support an Open Standard communication protocol, such as OpenADR, IEEE 2030.5, CTA-2045-A or equivalent, that is:
 - i. Included in the Smart Grid Interoperability Panel (SGIP) Catalog of Standards, and /or
 - ii. Included in the National Institute of Standards and Technology (NIST) Smart Grid Framework Tables 4.1 and 4.2.3, and/or
 - iii. Adopted by the American National Standards Institute (ANSI) or another well-established international standards organization such as the International Organization for Standardization (ISO) or the International Electrotechnical Commission (IEC)

BPA comments on proposed Title 24, Part 6, Section 110.12 (a)

The specification stated in this section does not specify that OpenADR 2.0a or 2.0b VEN compliance must exist locally at the appliance. OpenADR 2.0 is an application layer message exchange protocol. An area of concern is for a manufacturer to use a proprietary application layer at the demand responsive device and translate it into an

“open” protocol in the manufacturer’s cloud. This configuration does not suggest a wholly “open” communication network, but, rather, relies on the manufacturer’s proprietary application access and translation. That is why we suggest that the language proposed be changed to ensure the demand response communication protocol is an open standard communication protocol, like CTA-2045-A, physically located at the demand responsive device. The NRDC 45-Day Language Hearing comments correct this problem and further specify a number of other important details that must be addressed to have open communication at the device.

Thank you for your consideration. For any further communications please contact Tony Koch (Technical Lead) at 206-220-6777 or jakoch@bpa.gov.