DOCKETED

Docket Stamp Updated:	5/4/2018 1:40:43 PM
Docket Number:	17-BSTD-02
Project Title:	2019 Title 24, Part 6, Building Energy Efficiency Standards Rulemaking
TN #:	223320
Document Title:	Wayne Alldredge Comments On TN 223309 - 2019 Title 24
Description:	N/A
Filer:	System
Organization:	Wayne Alldredge
Submitter Role:	Public
Submission Date:	5/4/2018 9:05:30 AM
Docketed Date:	5/4/2018

DOCKETED

Docket Stamp Updated:	5/4/2018 10:25:47 AM
Docket Number:	17-BSTD-02
Project Title:	2019 Title 24, Part 6, Building Energy Efficiency Standards Rulemaking
TN #:	223320
Document Title:	Wayne Alldredge Comments On 2019 Title 24 Part 6 Building Energy Efficiency Standards
Description:	N/A
Filer:	System
Organization:	Wayne Alldredge
Submitter Role:	Public
Submission Date:	5/4/2018 9:05:30 AM
Docketed Date:	5/4/2018

DOCKETED

Docket Number:	17-BSTD-02
Project Title:	2019 Title 24, Part 6, Building Energy Efficiency Standards Rulemaking
TN #:	223320
Document Title:	Lutron Electronics Co., Inc. Comments On 2019 Title 24 Part 6 Building Energy Efficiency Standards
Description:	N/A
Filer:	System
Organization:	Lutron Electronics Co., Inc.
Submitter Role:	Public
Submission Date:	5/4/2018 9:05:30 AM
Docketed Date:	5/4/2018

Comment Received From: Lutron Electronics Co., Inc.
Submitted On: 5/4/2018
Docket Number: 17-BSTD-02

On 2019 Title 24 Part 6 Building Energy Efficiency Standards

Additional submitted attachment is included below.

From: Wayne Alldredge <walldredge@vca-green.com>
Sent: Friday, May 04, 2018 8:21 AM
To: Energy - Docket Optical System <docket@energy.ca.gov>
Subject: Wayne D. Alldredge Comment on Docket Number: 17-BSTD-02 TN #: 223309

Regarding: Docket Number: 17-BSTD-02 TN #: 223309
Project Title: 2019 Title 24, Part 6, Building Energy Efficiency Standards Rulemaking
Document Title: Lutron Electronics Co., Inc. Comments on the 2019 Title 24 Part 6 Building Energy Efficiency Standards

Mr. McAllister,
Thank you for the opportunity to voice comments on 2019 Title 24 Part 6.

I would like to voice support for the manufacturers that are voicing concern over the language regarding communication protocol. (In this case it is Lutron.) Disclosure: I am not now nor have I ever been an employee or investor in Lutron.

Regarding the proposed code language:
Chapter 2-110

1. Section 110.12 Mandatory Requirements for Demand Management.
   (a) Demand responsive controls
   2. All demand responsive controls shall be capable of communicating using one or more of the following: WiFi, ZigBee, BACnet, Ethernet, or Hard Wiring.

I believe this should be change to the following:
Chapter 2-110

1. Section 110.12 Mandatory Requirements for Demand Management.
   (b) Demand responsive controls
   2. All <u>demand response signal receiving</u> controls shall be capable of communicating using one or more of the following: TCP/IP, WiFi, ZigBee, BACnet, Ethernet, or Hard Wiring.

Rationale:

- There are systems using protocols such as DALI, Modbus, N2, etc., that are present in the equipment needing to be controlled. If you state "**all demand responsive controls**" you are including the entire universe of controls at every level including programmable logic controllers in manufacturing and industry. It also would include hubs, routers, repeaters, receivers, multiplexors, etc. It also would include the dimming modules in the fixtures! It is my opinion that the intent of the Commission is not to force the public into procuring controls compatible with only a few alliances and associations.
- Communication in certain facilities may be limited to certain technologies of communication hardware, (e.g., RS-485, coax cable, Cat-5, secure RF, low power RF, etc.), due to a variety of business needs and sensitivities. Protocols on top of this hardware like DALI, Dynet, LonTalk,

EnOcean, ZigBee, BACnet, Modbus, INSTEON, etc., are selected by manufacturers or customers for a variety of security, business, or trade specific reasons.

- It is also my opinion that the Commission's intent is that the Open ADR 2.0a and 2.0b signals are to be processed in an open, non-proprietary manner to ensure the signal can be used throughout a facility with any manufacturer's system. That is why I recommend adding TCP/IP in your list because this is the most common communication protocol used with the internet regardless of type of network hardware.
- I recommend using the language of "**all demand response signal receiving controls**" in order to ensure the OpenADR 2.0a and 2.0b signals can be received and processed in a non-proprietary manner by all manufacturers and yet allow these same manufacturers to control the end devices utilizing the communication technology best suited for the specific application or industry.

Thank you,

Wayne Alldredge, LEED-AP, WELL-AP, CEM, CEA, CBCP, EBCP, CMVP, GGP, CalCTP-ATT, HERS
Associate Director O&M, Energy, and Commissioning Services

VCA Green | Orange + Oakland
714.363.4700 | vca-green.com
1845 W. Orangewood Ave., Ste. 220
Orange, CA 92868