

DOCKETED

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SkyCentrics Inc. 15-Day Language Express Terms for Title 24 2019 Building Energy Efficiency Standards

Additional submitted attachment is included below.

SkyCentrics Inc
214 Grant Ave, Suite 325
San Francisco, CA 94018

Commissioner Andrew McAllister and Energy Commission Staff
Docket Unit, MS-4
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512

SkyCentrics Comments on 15-Day Language Express Terms for Title 24 2019 Building Energy Efficiency Standards (Docket No. 17-BSTD-02)

Dear Commissioner McAllister and Energy Commission Staff,

Section 110.12(a).1

SkyCentrics supports the recommendation submitted by Mitsubishi Electric US, Inc. on May 4, 2018, (TN#223325), and as supported by Portland General Electric (TN# 223336) and Jackson Electric Membership Corporation (TN#223333) and requests that CEC adopt the language proposed.

SkyCentrics Inc.

SkyCentrics Inc. is a manufacturer of communications devices for residential and commercial appliances, and a developer of a cloud-based monitoring and control platform used by utilities, appliance manufacturers, building owners and tenants to maximize the energy efficiency of buildings and provide services to the grid.

SkyCentrics adopted the CTA-2045 open standard as it represents the most modern and efficient approach to making appliances and devices smart and grid-connected. CTA-2045 was developed by manufacturers, utilities and industry research organizations, and certified by Consumer Technology Association (CTA) so as to achieve the shared goals. CTA-2045 is gaining traction with utilities including Con Edison, Jackson EMC, and Portland Gas & Electric, and has been adopted by major manufacturers including AO Smith, Mitsubishi, Siemens, Emerson, Pentair, and Islandaire. In addition, AHRI has adopted AHRI 1380, with CTA-2045 as one of the two communications and control standards.

CTA-2045 meets all of the objectives of the CEC in terms of providing a consistent, reliable, and open standard that avoids the creation of stranded assets and should be given equal standing to OADR.

OADR requires a separate SSL certificate for every single implementation. The retail **yearly** cost for an SSL security certificate is about \$40. While bulk purchasing can significantly reduce the cost, it is still a significant impediment to the implementation of OADR at the device level. CTA-2045 achieves security without this additional cost.

Best Regards,

Tristan de Frondeville

CEO