**OpenADR Alliance Comments to Flexible Demand Appliance Standards**

*Additional submitted attachment is included below.*

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California Energy Commission
Docket Unit, MS-4
Docket No. 20-FDAS-01
1516 Ninth Street
Sacramento, CA 95814-5512


**Re: Docket No. 20-FDAS-01 – Flexible Demand Technologies for Appliances – Reply to posed questions**

Dear Commissioners,

On behalf of the OpenADR Alliance (Alliance), thank you for the opportunity to comment on the California Energy Commission's (CEC) efforts to enact regulations to establish standards for flexible demand technologies for appliances. We are pleased to be a part of this process.

The OpenADR Alliance was created to standardize, automate, and simplify Demand Response (DR) and Distributed Energy Resources (DER) control to enable utilities and aggregators to cost-effectively manage growing energy demand & decentralized energy production, and customers to control their energy future. OpenADR is an open, highly secure, and two-way information exchange model and Smart Grid standard. Currently the Alliance has 165 member companies and over 225 certified products.

The OpenADR Alliance fully supports all standardization efforts concerning connecting customer resources to the grid. Therefore, we are pleased to provide responses to questions posed in the staff paper "Introduction to Flexible Demand Appliance Standards".

**Flexible Appliance Demand Response Modes**: The Alliance is not commenting on this question. Generally, we do enable manufacturers and utilities to implement their own mechanisms. We are however open to take the requirements derived from this effort and add them to the OpenADR specifications.

**Flexible Demand Appliance Standards**: The Alliance is proposing a combination of OpenADR (utility to gateway) and CTA-2045 (physical interface on the appliance) for appliances. There are currently several efforts on the West Coast that establish requirements for a CTA-2045 interface for appliances, more specifically for Heat Pump Water Heaters. The use of CTA-2045 as the plug-in interface on the appliance requires only a simple implementation of the CTA-2045 port. If harmonization of requirements can be achieved, it will enable manufacturers to only produce one variant of the product. NEEA, the Northwest

Energy Efficiency Alliance, and the OpenADR Alliance are currently collaborating to establish compliance and test procedures for CTA-2045. It is expected to have the first certified products by the end of March 2021. This certification will encompass only the communication portion and not the performance of the appliance. The performance could be evaluated and measured by other - already existing – standards like EnergyStar.

**Cybersecurity**: The Alliance is proposing common transport layer security for the connection between the utility and the customer premises (TLS 1.2). All OpenADR links are secured with this mechanism already. CTA-2045, at the interface point to the appliance, does not require additional cybersecurity protection as it represents a physical connection port.

The Alliance is prepared to offer further vendor-neutral assistance to the CEC if required. Please feel free to reach out at any time.

Best Regards,

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