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23-FDAS-01 has just had an update titled "Pool Controls Rulemaking"

The first mention of smart grid or open standards is on page 17. Ironically, it is the first in the list of "Data Submittal Requirements" but there is no mention of WHICH Smart Grid Open Standards in which the commission has an interest? But as the first item in the list, it seems important, so shouldn't the commission list smart grid open standards in which it is interested in having the OEM participate?

The original 2022 release of this rulemaking spoke about the schedule and also about how there would be open standard communication to the pool control. But, as we discussed in our initial comments on the rulemaking, the open standard communication mentioned in the 2022 document was TCP/IP, which as SkyCentrics submitted at the time, was not a very useful open standard since it allowed communication, but it allowed every OEM to have a different instantiation of the language/protocol that they would use, and the smart grid signals and responses that they might implement, which would create a Tower of Babble situation, as opposed to an open standard which creates common language/protocols and common signals and responses.

All of this sequence of efforts to create a grid-responsive load in OEM equipment has already occurred with water heaters over the last 10 years. And they ended up implementing an open standard hardware port as the best solution. Why the best? Because:

1. You guarantee a minimum signal response in all OEM equipment and the ability to communicate to that equipment for its entire life, guaranteed
2. You guarantee communication path flexibility (wifi, cellular, Lora, powerline carrier, ethernet, etc.). This is critical because some electric loads are big enough that they require guaranteed access such as that provided by cellular, but other times, the instability but free cost of a wifi connection may be suitable.
3. You guarantee competitive access to the load. The biggest concern that we have about the current rulemaking is that it (a) focuses on a default schedule that is not easy for pool control vendors to implement in their distribution channels because different states will have different default schedules, and (b) it gives the OEMs the ability to monopolize access to the load because the only access to the load they may have to provide is their own cloud through which they will have monopoly control, with all the inherent issues around monopolies.
4. You guarantee the lowest cost method to replace a vendor that is charging too much to access that load.

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