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SkyCentrics comments on Fluidra comments

SkyCentrics would like to thank Fluidra for making specific comments on connectivity. In particular, they say:

"Fluidra agrees to keep the connectivity options open to the manufacturer and utility aggregators. We strongly recommend cloud to cloud (API) communication to connected equipment. Each manufacturer of connected products already has some sort of API infrastructure in place which would make this the easiest and fastest transition for the industry. Fluidra connected products can already receive commands from our cloud-based API systems.

External hardware devices such as CTA-2045 are not necessary and should not be made mandatory. Can be one of the options that a manufacturer may choose for connectivity, not a mandatory requirement."

SkyCentrics would like to point out to the commission that no manufacturer has ever provided a CTA-2045 EcoPort as a standard issue on their product without a mandate. Manufacturers are quite happy to provide API access to their products because then (a) they don't have to make changes to their hardware, which they generally like to avoid doing and (b) it means that at scale, they have monopolized the access to their devices, without any competition being possible. It means that there is no other way to provide price and carbon signals to the devices.

The competition and the utilities also have no guaranteed access to an alternative communication path than that chosen by the OEM. In most cases that will be Wi-Fi. Utilities have a lot of issues with customers keeping their devices on Wi-Fi when they change their password and they incur operations costs to put them back on. They would like alternative choices when possible, which a hardware CTA-2045 EcoPort guarantees.

Historically, utilities have had trouble with this model because they have to negotiate contracts with every manufacturer. They are also susceptible to manufacturers randomly end-of-lifing access to their API. Some utilities have told us that they prefer to have one CTA-2045 module maker to work with, then to have to negotiate contracts with every OEM and then integrate with every different API, and to date, there has never been an API standard for utility signals.