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Request for reinstallation of FM broadcast systems in the final version of the Appliance Standards for Pool Controls

Please, see document attachment.

PS. Public information about our collaborative project on the matter named FLEXIMAX can be provided on request if you are interested to see what we are doing in Europe in a similar domain.

Additional submitted attachment is included below.

September 11, 2023

California Energy Commission Docket Unit
715 P Street, MS-4
Sacramento, CA 95814

RE: Pool Controls Rulemaking and Flexible Demand Appliance Standards for Pool Controls [Docket No. 23-FDAS-01]

As the California Energy Commission reviews and adopts regulations for Flexible Demand Appliance Standards (FDAS), it's recommended that FM broadcast technology, proven in both the U.S, Europe and around the world, be included for the intelligent energy management of flexible demand responsive appliances.

As proposed, the current language specifically defines a "Connected Device" as bi-directional only, fundamentally excluding an FM radio-based solution. In addition, the new revision eliminated the definition for a radio-based communication system.

In France, we are working on an EU project named Fleximax, leveraging our existing national FM network (Radio-France) to form a cost-effective, secure and climate-friendly communication network to create and support flexible demand appliances at scale. The simplicity of the FM-based method provides a low-cost, readily available solution to meet the increasing challenge that climate change has posed across the globe. It's an intelligent solution that the EU is closing monitoring as our findings could also form a basis for UN adoption as we have technical advisors on Fleximax team that also has an UN technical advisory role.

Like France, California already has public and private FM networks covering most of the population.

As stated by e-Radio in an earlier submission to this docket, there are no borders to GHG and California is an important market for green energy technology. The state's existing FM broadcast infrastructure, combined with private public partnerships, can take urgently needed actions by driving innovation, pool funding, and co-ordinate regulatory and scalable technical solutions to our global warming crisis.

For these important reasons, I ask that the FM broadcast systems be reinstated in the final version of the Appliance Standards for Pool Controls.

Thank you for your consideration.

Jerome Gilbert
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