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Bay Alarm Company Response to Docket 17-AAER-12 - Low Power Mode

Additional submitted attachment is included below.

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November 18, 2024

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512

Electronic Submittal

Ref: 17-AAER-12
Low Power Mode
Data Collection Procedure (DCP) for the California Energy Commission's (CEC) Low Power Mode (LPM) Roadmap Proposal

Ladies and Gentlemen:

Bay Alarm Company thanks the Commission for the opportunity to submit public comments regarding the proposed Data Collection Procedure for the Low Power Mode Roadmap proposal. Bay Alarm Company has been providing intrusion detection and fire alarm services throughout California since 1946.

Within our scope of work, we provide and install smoke and carbon monoxide detectors with commercial and residential occupancies. These devices do not have a source of power directly within them. The power for these devices come from the control unit that they are connected to, which is in most cases either a Fire Alarm Control Unit (FACU) or a combination Fire Alarm / Intrusion Detection panel.

These control panel are regulated by several industry standards, including:

- UL 864, *Control Units and Accessories for Fire Alarm Systems*
- UL 1023, *Household Burglar Alarm System Units*

Smoke detectors are regulated by UL 268, *Smoke Detectors for Fire Alarm Systems.*

Carbon Monoxide (CO) detectors are regulated by UL 2075, *Gas and Vapor Detectors and Sensors.*

The installation of these devices is regulated by NFPA 72, *National Fire Alarm and Signaling Code*.

Within Appendix A of the proposed Data Collection Procedure Proposal there is a reference to smoke and carbon monoxide detectors within the Infrastructure / Power category. The power consumption of these devices is well documented within the manufacture's published literature and the required test results by UL. The power for these detection devices come from the control units that they are connected to.

The power consumption for the control units / panels is documented within the manufacture's published literature and the required test results by UL.

The single exception to this is for wireless detectors. For these detectors, the power comes from an internal battery. There is no connection to building power for these detectors.

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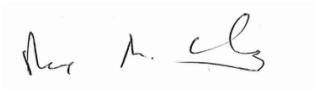
Bay Alarm Company is requesting that the reference to smoke and carbon monoxide detectors be removed from Appendix A. These devises are not directly connected to 120 VAC, and are part of an overall fire and life safety system.

To avoid confusion, Smoke Alarms and Carbon Monoxide Alarms are. These are standalone devises that are not connected to a system. They are regulated by the following standards:

- Smoke Alarms – UL 217, *Single and Multiple Station Smoke Detectors*
- Carbon Monoxide Alarms – UL 2034, *Single and Multiple Station Carbon Monoxide Alarms*

Within the manufacture's published literature for these devices, the power consumption requirements are provided. For these devices to operate, they must maintain this power usage.

Sincerely,



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