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Bonneville Power Administration's Comments - 15-Day Language Express Terms for Title 24 2019 Building Energy Efficiency Standards

Bonneville Power Administration supports the open communication protocol CTA-2045 for on-device demand response signal processing and would therefore implore the CEC to add a subsection C. to the Revised Express Terms for Title 24 section 110.12.a.1 as shown below:

1. All demand responsive controls shall be either:

A. A certified OpenADR 2.0a or OpenADR 2.0b Virtual End Node (VEN), as specified under Clause 11, Conformance, in the applicable OpenADR 2.0 Specification; or:

B. Certified by the manufacturer as being capable of responding to a demand response signal from a certified OpenADR 2.0b Virtual End Node by automatically implementing the control functions requested by the Virtual End Node for the equipment it controls.

C. Certified by the manufacturer as being capable of responding to a CTA-2045 demand response signal on an SGD (Smart Grid Device) via a UCM (Universal Communication Module) communicating using one or more of the technologies specified in Section 110.12(a)2.