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**17-BSTD-02 2019 Title 24, Part 6, Building Energy Efficiency Standards Rulemaking
- SkyCentrics support for A.O Smith comments**

SkyCentrics supports the statements of A.O. Smith in its comments on Section 110.12 TN#223361 Demand Response “ Section 110.12(a).

SkyCentrics agrees that the Commission should take a technology neutral approach regarding communication protocols. The requirement for OADR excludes emerging open standards such as CTA-2045/AHRI1380 which provide the same benefits in terms of avoiding stranded assets and proprietary systems as OADR but at a lower cost due to the elimination of per device certificates that must be renewed annually.