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CEA comment on 15-day language: Section 110.12

Additional submitted attachment is included below.

May 7, 2018

California Energy Commission
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RE: Docket 17-BSTD-02
2019 Building Energy Efficiency Standards 15 Day Language, §110.12

The California Energy Alliance appreciates the opportunity to provide feedback to the California Energy Commission on the 15 Day Language for the Title 24 code. We know this is very late in the process, so we'll limit ourselves to our one significant concern in the section covering Demand Management and Demand Response - §110.12. Here is the language in the code we wish to draw your attention to and that we would like removed from the standard:

(a) Demand responsive controls.

2. All demand responsive controls shall be capable of communicating using one or more of the following: Wi-Fi, ZigBee, BACnet, Ethernet, or hard-wiring.

3. Demand responsive controls may incorporate and use additional protocols beyond those specified in Sections 110.12(a)1 and 2.

Several times through the 2019 Code process we've made clear our objection with having a specific list of communicating protocols in the code. We've heard that the CEC doesn't not believe it should be picking "winners and losers" in any technology, but by listing specific communication protocols the CEC has done exactly that. While the market has already adopted several of these older identified protocols, other protocols (both open and proprietary) are being used widely to communicate between systems or devices, meeting the same goal. Many other protocols, such as 6LoWPAN, Thread, or Bluetooth Low Energy, are available now or in development. These protocols should not be excluded by the CEC.

The CEC should not limit communication between system components. Doing so limits competition and innovation. As long as the demand responsive system is able to respond to an OpenADR 2.0a or 2.0b communication signal, it does not matter what the communication protocol is internal to the demand responsive system. To resolve this issue, we urge the CEC to strike 110.12(a)2 and 3.

Again, we appreciate the opportunity to provide comments to the CEC, and if further discussion with the CEC is desired we would ensure that key members of our organization would be available.

Best Wishes,

Charles Knuffke
Technical Co-Lead
California Energy Alliance