

**DOCKETED**

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**Support of open standards for large loads and appliances**

*Additional submitted attachment is included below.*



STATE OF WASHINGTON  
DEPARTMENT OF COMMERCE  
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January 24, 2020

Commissioner J. Andrew McAllister  
California Energy Commission  
1516 Ninth Street  
Sacramento, CA 95814

Re: Docket Number 19-OIR-01, Load Management Rulemaking

Dear Commissioner McAllister:

On behalf of the Washington State Department of Commerce I want to thank you for providing the opportunity to comment on the Commission's load management rulemaking. Washington State supports modular, open standards that are both good for consumers and allow innovation for connected devices. To this end, Washington has recently enacted legislation supporting the deployment of grid connected water heaters, which represent an important tool for achieving our goals of 100% clean energy by 2045.<sup>1</sup>

On May 7, 2019, Governor Jay Inslee signed into law House Bill 1444 (codified in Chapter 19.260 Revised Code of Washington), which adds 17 new products to state standards last updated in 2009. This legislation was based on a model bill created by the Appliance Standards Awareness Project<sup>2</sup> with the standards estimated to save Washington consumers and businesses \$2 billion in energy and water costs over 15 years.<sup>3</sup>

Commerce supported this bill as agency request legislation, and worked with the legislative sponsor to include electric storage water heaters. Leading on an appliance standard is a big step for Washington, which has historically taken more of a follower role when it comes to appliance standards. However,

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<sup>1</sup> Chapter 19.405 RCW

<sup>2</sup> <https://appliance-standards.org/states>

<sup>3</sup> Mauer, Joanna, Andrew deLaski, and Marianne DiMascio. "States Go First: How States Can Save Consumers Money, Reduce Energy and Water Waste, and Protect the Environment with New Appliance Standards." (2017).



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there are several reasons the State decided to prioritize this new design requirement for electric storage water heaters.

First, we were able to understand the impact of the standard through data collected in a regional pilot program conducted by Portland General Electric, Bonneville Power Administration and the Northwest Energy Efficiency Alliance.<sup>4</sup> Having these regional behavioral data and the technical resources to support our work were critical in supporting the inclusion of this standard in the 2019 legislation.

In addition, Commerce understands that grid connected technology supports the electric grid of the future by enabling utility programs to manage water heating loads more effectively and reduce demand during peak periods of energy use. The extra flexibility also makes it easier to manage the grid as utilities add more renewable energy to meet our clean energy goals, including the Clean Energy Transformation Act.<sup>5</sup>

Finally, Commerce supports modular, open standards that are both good for consumers and allow innovation for connected devices, and we support a broader conversation about how these types of standards can be employed in other states. We look forward to further supporting these open standards to help build the flexible grid of the future.

Sincerely,

Sarah Vorpahl, Ph.D.  
Senior Energy Policy Specialist  
Washington State Energy Office

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<sup>4</sup> CTA-2045 Water Heater Demonstration Report Including A Business Case for CTA-2045 Market Transformation, BPA Technology Innovation Project 336

<sup>5</sup> Chapter 19.405 RCW