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*Comment Received From: Ashruf El-Dinary
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Xperi Corporation Comments on Load Management

Additional submitted attachment is included below.

March 16, 2020

California Energy Commission
Docket Unit, MS-4
Docket Number: 19-OIR-01
1516 Ninth Street
Sacramento, CA 95814-5512

Subject: Comments on California Energy Commission Load Management Docket Number 19-OIR-01

Xperi Corporation, a technology company with headquarters in San Jose, California, respectfully submits comments on the California Energy Commission's (CEC) proposal for Load Management Rulemaking. The Commission seeks to improve utility grid management, increase demand flexibility, and reduce peak loading through automatic notification to consumers and devices. Engineers at Xperi Corporation are currently investigating technology applications to service multiple devices simultaneously through efficient, cost-effective communication networks. For utility applications, we are working with e-Radio Incorporated of Redwood City, California to broadcast utility information using publicly accessible radio airwaves using open protocols such as ANSI/CTA-2045.

Radio broadcasting is the most cost-effective transmission technology to reach many devices with a common message. The one-to-many efficiency of radio allows operators to scale services to millions of "listeners" without increasing operational costs. The transmission infrastructure already exists across the U.S. AM and FM radio stations operate in all major markets providing over 93% of the U.S. population with radio services.

Advances in digital radio broadcasting have allowed AM and FM radio operators the ability to efficiently transmit data services over their existing FCC frequency allocations. The In-Band On-Channel (IBOC) digital radio standard NRSC-5-D¹ defines the technology and protocols necessary for radio stations to achieve reliable digital communications on current commercially operated radio stations. Digital radio broadcasting enables higher data transmission rates than analog. Digital data transmission will allow for device addressable protocols to manage substations and location-based messaging to consumer devices. The IBOC digital radio standard is implemented on 2400 radio stations across the United States.

¹ NRSC-5-D *In-Band/On-Channel Digital Radio Broadcasting Standard*, National Radio Standards Committee, April 2017. <https://www.nrscstandards.org/standards-and-guidelines/documents/standards/nrsc-5-d/nrsc-5-d.asp>



Ashruf El-Dinary
Senior Vice President
Radio Technology Solutions

We are planning to conduct a live demonstration of our technology in California with e-Radio and other industry partners in 2020 to support real-time tariff and emergency load reduction for fire mitigation and invite all stakeholders of this load management docket to observe the results of this proof of concept activity.

Sincerely,

A handwritten signature in black ink, appearing to read "Ashruf El-Dinary".

Ashruf El-Dinary
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