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February 3, 2021

California Energy Commission
Docket Unit, MS-4
Docket No. 20-FDAS-01
1516 Ninth Street
Sacramento, CA 95814-5512

Re: Docket No. 20-FDAS-01 – Regulations to Establish Standards for Flexible Demand Technologies for Appliances

Dear Commissioners:

On behalf of Bradford White Corporation (BWC), thank you for the opportunity to comment on the California Energy Commission's (CEC) efforts to enact regulations to establish standards for flexible demand technologies for appliances. We are pleased to be a part of this important conversation.

BWC is an American-owned, full-line manufacturer of residential, commercial, and industrial products for water heating, space heating, combination heating, and water storage. In the State of California, a significant number of individuals, families, and job providers rely on our products for their hot water and space heating needs.

We appreciate the overarching goal that is advanced by the passage of Senate Bill 49. BWC believes that this action is pivotal to achieving improved energy efficiency in the state, while potentially having the added benefit of promoting our shared goal of increasing the market for electric heat pump water heaters throughout California.

As the CEC continues to consider this matter, BWC urges the commission to allow product manufacturers as much intellectual flexibility as possible when designing and developing demand response products. This market is still in its infancy, meaning that manufacturers and utility stakeholders alike will be constantly learning about, and adapting to, new challenges and opportunities as the market matures. For this reason, it will be important for manufacturers,

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utilities, and regulatory bodies, to have a full arsenal of options at their disposal when troubleshooting various customer concerns that arise as adoption and use of flexible demand response products increases.

Additionally, as this rulemaking continues, we ask the CEC to continue to host inclusive dialogues between product manufacturers and utility providers. For any utility demand response program to be effective, it must include clearly defined responsibilities between these groups of stakeholders. This will help to clarify the expectations of home and building owners who choose to participate in these programs and will assist in directing them to the appropriate body when they have any questions or concerns.

The CEC could greatly assist in facilitating this conversation, while also providing clarity to home and building owners, by surveying utility stakeholders to ascertain, at a minimum, the following information:

- Will utility schedules for these products be stored in a central database?
- What will the effect be on the home or building owner if these schedules change?
- Will such changes be seamless to the consumer or building owner, and will they be notified?
- Will utilities put procedures in place for when buildings participating in the program change ownership?
- How will the new owner of a home or building be made aware of the building's participation?

Further, BWC encourages the commission to consider actions that have been taken by other bodies related to connected water heaters while examining the best path forward for California's own utility demand response program. Most prominently, the water heater industry is currently working together through the Air Conditioning, Heating, and Refrigeration Institute (AHRI) to develop Standard 1430, which is expected to be finalized towards the end of 2021. This standard will include several requirements for these products that the CEC is presently considering. As such, we would recommend that the CEC allow this process to conclude as it would serve to inform the commission on manufacturers' positions on the important matters surrounding this conversation. Further, the CEC harmonizing their own utility demand response program with Standard 1430 will assist in providing more clarity for manufacturers, and installers, which consequently will lower the cost of installation for these products over time.

Additionally, other measures have been finalized, or are in progress, related to grid interactive electric heat pump water heaters. These include actions by the Washington Department of

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Commerce, the Oregon Department of Energy, ENERGY STAR[®], and the CEC's own Joint Appendix 13 to the 2019 Building Energy Efficiency Standards. We urge the commission to maintain as much consistency as possible with these measures when considering certain aspects already addressed by them. Many manufacturers have already made significant investments to achieve the goals and requirements included in these measures and the commission's harmonization with them will help to speed market availability and adoption of utility demand-response water heaters.

Finally, BWC wishes to alert the CEC that requirements related to utility demand-response water heaters are included in the Codes and Standards Enhancement (CASE) Initiative for the 2022 California Energy Code. This initiative recommends a required CTA-2045 communications interface to facilitate demand-response and load-shifting responsibilities for certain water heaters. We believe it would be premature for the CEC to include this requirement in the 2022 California Energy Code and that the commission should instead continue to use Docket No. 20-FDAS-01 to fully examine the potential impacts of such a policy on the state and the water heater market.

Thank you for including BWC, and other stakeholders, in this important conversation. We look forward to partnering with the commission as this work continues. If you have any questions, or need any additional information, please do not hesitate to contact me directly.

Respectfully Submitted,

Bradford White Corporation

Eric Truskoski
Senior Director of Government and Regulatory Affairs

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