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e-RadioComments on Load Management Docket Number 19-OIR-01

Additional submitted attachment is included below.



April 23rd, 2021

Via email to: docket@energy.ca.gov

California Energy Commission

Docket Unit, MS-4

Docket Number: 19-OIR-01

1516 Ninth Street

Sacramento, CA 95814-5512

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

e-Radio is excited by and supports the California Energy Commission's ("CEC") vision of residential and small commercial real time responsive loads, as reflected in the draft Load Management Standards ("LMS") and Flexible Demand Appliance Standard ("FDAS").

e-Radio's communications solution is unique in its level of high reliability, strong security, and the ability to reach all markets including rural, disadvantaged, and low-income segments.

e-Radio's broadcast solution can provide load management for major grid impact devices like water heaters and electric vehicles. Due to its simplicity, it can potentially also affect low-powered devices such as cell phone chargers, set top boxes, and e-bike chargers that, in aggregate, can exceed peaker plant capacity.

<https://sepapower.org/knowledge/dont-forget-about-radio-leveraging-one-way-communications-to-inform-devices-and-users/>

To demonstrate, verify and quantify our capabilities as stated in previous submissions to this docket, e-Radio is currently conducting self-funded live experiments in the Bay Area and in Sacramento managing responsive loads via our FM broadcast hybrid communications system. We would be happy to publicly share our data and findings in support of CEC LMS, Appliance and EPIC Hub activities. These include projections of full scaled grid and consumer values and identification of impediments such as lack of consumer market acceptance.

In order to improve meaningful measurement and comparison of performance between various smart grid products and services, as well as to facilitate consumer acceptance, e-Radio has ongoing work on objective and subjective consumer metrics which have been published at SEPA. <https://sepapower.org/knowledge/designing-consumer-metrics-for-grid-connected-devices/>

Additional data from this work can be found at <https://irecusa.org/2021/03/interstate-renewable-energy-council-to-host-customer-grid-edge-committee/>

We are convinced that effective, universal real-time load management can be implemented in California in a fraction of the current timeline envisioned, at less cost, complexity and with a higher degree of security.

Thank you for your consideration.

Jackson Wang, P.Eng.

CEO

e-Radio USA, Inc.