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Xperi Corporation -- Comments on Load Management

Additional submitted attachment is included below.

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Senior Vice President
Radio Technology Solutions

February 7, 2022

California Energy Commission
Docket Unit, MS-4
Docket Number: 21-OIR-03
1516 Ninth Street
Sacramento, CA 95814-5512

Subject: Comments on California Energy Commission Load Management Docket Number 21-OIR-03

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.

Xperi supports the investigation of broadcast services to support Load Management and Demand Response programs.

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 across the U.S. providing full market coverage of the U.S. population with radio services.

Digital radio systems, such as HD Radio broadcasting, allow for more efficient transmission of digital data services compared to RDS or other analog subcarrier systems. HD Radio data rates can be scaled to support different message sizes associated with short packet communications. Our engineering teams have developed a secure network distribution service providing content owners and service operators with an efficient portal to access the untapped digital data bandwidth of HD Radio stations across the country. Messages may be sent through this service utilizing a high-level addressability function, targeting specific device types or manufacturer products based on generalized codes and model numbers. This secure and resilient distribution

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network is currently under test across several markets. With HD Radio broadcast stations covering much of California and serving 95% of the population with digital broadcasting, we believe that the HD Radio data network is a reliable, secure transport for data services in California.

Xperi's HD Radio team has partnered with eRadio to evaluate proof of concept for delivery of demand response messages and rate profiles through reception in CTA-2045 compliant modules utilizing existing digital radio broadcast stations. Tests are underway across the nation as we continue to compile data and document the use cases for public record.

Sincerely,

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