

DOCKETED

Docket Number:	20-FDAS-01
Project Title:	Flexible Demand Appliance Standards
TN #:	245770
Document Title:	FLUIDRA Comments for Flexible Demand Appliance Standards
Description:	N/A
Filer:	System
Organization:	FLUIDRA
Submitter Role:	Public
Submission Date:	8/31/2022 4:57:08 PM
Docketed Date:	8/31/2022

*Comment Received From: FLUIDRA
Submitted On: 8/31/2022
Docket Number: 20-FDAS-01*

Comments for Docket 20-FDAS-01 Flexible Demand Appliance Standards

Additional submitted attachment is included below.

August 31th, 2022

California Energy Commission
Docket Unit
Re: Docket No. 20-FDAS-01, Docketed Date: 6/29/2022
715 P Street
Sacramento, CA 95814

Re: Request for Information, and Pre-Rulemaking Draft of the Proposed Language for Flexible Demand Appliance Standards, Docket 20-FDAS-01, Docketed Date: 6/29/2022

Esteemed California Energy Commission,

Fluidra appreciates the opportunity to participate in the rule making process for Flexible Demand Appliance Standards (FDAS) to meet the GHG reduction and electric grid resiliency goals of California Senate Bill SB 49. As a pool equipment manufacturer with U.S. Headquarters in California, Fluidra recognizes the importance and demand for energy efficient and environmentally sustainable swimming pool operation. Accordingly, continual efforts are made in the development of products that can meet the competitive goals of a sustainable future.

As a member of the Pool & Hot Tub Alliance Fluidra fully supports and endorses the comments jointly submitted by the Pool & Hot Tub Alliance (PHTA). In addition, we submit the following comments intended to help the Energy Commission develop Flexible Demand regulation that can achieve and maximize the energy goals of the FDAS program, while minimizing any negative impact to the consumer and the pool industry. Fluidra hopes to provide helpful insight into the possibilities, complexities, consumer engagement, and safety considerations for Flexible Demand Response in a swimming pool system.

Effective Date

The proposed effective date of 12 months after rule publication (January 2024) is extremely aggressive and does not allow pool control manufacturer's the adequate time to comply. Although modern pool controls are generally connectable products, significant time and resources are needed to update product firmware, software, and IOT infrastructure to be inline with the proposed FDAS requirements. In order to ensure a product functions properly, reliably, and safely when it launches into the market, responsible manufacturers must apply rigorous design verification testing, certification, quality control, manufacturer set-up, marketing/education, and launch. Spread across the various system platforms a manufacturer may offer, the time and resources required grows exponentially.

We feel a minimum **3 to 5 years** is not unreasonable to allow the manufacturers have the adequate time to develop pool controls that will be safe and reliable for the consumer, helping to ensure the sustainability of this program for the future.

Clock Requirements

With regards to the requirement for automatic local time synchronization:

- b. the system clock shall have the ability to synchronize with local time automatically.

The vast majority pool control products that are currently in the market, although they may be connected products, do not have the ability to synchronize with local time automatically. This is not a critical IoT function for pool controls as they are for a cell phones. Once the system is installed, the user or pool professional can set the local time accordingly. Pool controls once installed are not moved from place to place, which would be the benefit for local synchronization, and why it's so important to the user experience of a mobile phone.

We feel this is an extraneous requirement with added cost and little benefit to the consumer, which would require significant development and resources to the IoT infrastructure of pool controls.

Default Schedules

We understand the reasoning of the default schedule chosen by CEC to minimize carbon emission and peak energy demand. However, pool systems are not a one size fits all type of system. We would recommend making any required scheduling to be "selectable" and not the default. Or simply requiring the product instructions to include the recommended California Energy Commission scheduling requirements.

Definition of Pool Controls

Fluidra recommends to clarify the definition of pool controls as redlined below.

"Pool control" means any component or group of components that:

- (1) Causes the pool filter pump and other pool equipment to *independently* start or stop operation, and
- (2) Uses single-phase AC power as input power.

Pool controls exclude pool controls marketed exclusively for use as a control for pool filter pumps with a rated hydraulic horsepower (hhp) greater than 2.5 hhp.

Cordially,



Philip Escobedo
FLUIDRA - Regulatory Compliance Manager
pescobedo@fluidra.com