

DOCKETED

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Herter - broadcast, usability, and CEC staff participation

Additional submitted attachment is included below.

Thank you for the opportunity to comment on the Energy Commission's proposed flexible demand appliance standards for pool pumps. My recommendations are as follows.

1. Lower the risks of cybersecurity threats and media backlash by specifying requirements for signal reception (from system to pool pump), not for appliance data transmission (from pool pump to system).

The CEC should carefully consider any requirement for 2-way communication in the Flexible Demand Appliance Standards (FDAS). This requirement could not only introduce government-mandated cybersecurity weak points into each compliant device, but could also risk the optics of mandatory government collection of customer data. The DRAFT REPORT would benefit from an analysis of the value and risks of the return communication path inherent in a 2-way system relative to those of a 1-way system that requires only device notification (without data collection).

One-way communication for notification of electricity prices and other potential grid signals would reduce the likelihood of a media backlash such as the one that occurred in 2008. Optional recommended return paths from the premises can be specified for advanced functionality involving, for example, utility incentive programs or transactive energy pricing. Such advanced functionality is important, but need not be adopted by every flexible device in the state. Most appliances can successfully modify demand, lower customer costs, and reduce environmental impacts by simply responding to a broadcast of publicly available prices, greenhouse gas emissions metrics, and emergency signals. Where data collection from customer premises is a priority, a representative sample of devices/homes should suffice.

2. Incorporate usability standards to ensure flexibility features are usable and used

Usability will be key to successful implementation of flexible appliance standards. In the best-case scenario, FDAS compliant devices would be plug-and-play, with no customer configuration needed. In lieu of a plug-and-play requirement, consider requiring a minimum score from a standard usability test (such as the System Usability Scale) to weed out devices that are not user friendly.

3. CEC staff are encouraged to enroll in programs that make use of technologies similar to those in the proposed regulations.

Some recommended options include:

- [PG&E's WatterSaver Program](#)
- [SMUD's PowerMinder Program](#)
- [SMUD's Managed EV Charging Pilot](#)

Sincerely,

Karen Herter