

**Energy - Docket Optical System**

**From:** Girish Ghatikar [gghatikar@lbl.gov]  
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**Subject:** 12-BSTD-05

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**Categories:** Ready to Docket

I am submitting comments for the Demand Response (DR) signals and use of open data communication models to facilitate it.

The language that prescribes how these DR signals be used to meet "Mandatory Requirements for Space Conditioning Equipment" for Automated DR is not clear (section 110.2).

The comments applies to the following quotes from the document

**Automatic Demand Shed Control:** Upon receipt of a demand response signal, the space-conditioning systems shall conduct a centralized demand shed, as specified in 120.2(h)1 and 120.2(h)2, for non-critical zones during the demand response period.

**Demand responsive controls and equipment:** Demand responsive controls and equipment shall be capable of receiving and automatically responding to at least one standards based messaging protocol which enables demand response after receiving a demand response signal.

**To make sure we give clear message to the market and also bring the vision of "low-cost" automation and facilitating "dynamic pricing" markets,** we suggest the following revisions.

1. (Pg. 83) Clearly define the term "standards based messaging protocol"
2. (Pg. 82) The earlier recommendations to suggest inclusion of "open" standard that is part of the national Smart Grid interoperability standards, coordinated by National Institute of Standards and Technology, is struck-out (deleted?). We request that it is reinstated.
3. In addition, it is important that the language include the following to address the above issues
  - a. **"Open"** standard: This will ensure that the cost of DR automation is lowered and consumers benefit from reduced cost of products.
  - b. The standard includes **"test and certification program:"** The compliance of equipment to the code can be ascertained if there is a testing and certification program to support it.
  - c. The standard is supported by a **"neutral agency"** that fosters adoption of such standards: This makes sure that any supported standards in the equipment has some certainty of continued support for broader adoption.
  - d. The standard support **"two-way communication:"** This is important if the systems using such a standard meet all the current and future DR program requirements.
  - e. The standard include **"cyber security"** component: Security is an important piece of the standards, which needs to be considered during the implementation. Such security must meet the requirements of national standards for DR.

Thank you,  
-Rish

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