

The National Rural Electric Cooperative Association (NRECA) is the national service organization for more than 900 not-for-profit rural electric utilities that provide electric energy to approximately 43 million consumers in 47 states or 12 percent of the population. We are pleased for the opportunity to comment on this proposal, and, on behalf of our membership, make the following comments.

EPA has proposed a new definition for “System Operator” to account for applicability with demand response capabilities. We concur in this revised definition.

We are also in agreement that the connected product criteria must meet safety standards and cannot adversely impact the products operation.

Line 281 mentions the possibility of at least two alerts, such as door left open, reminder to clean refrigerator coils, etc. We suggest that you include a high temperature alert (that is, the door is shut but the temperature is rising)

Line 320 suggests that one aspect of demand management would be shortened or delayed defrost cycle and ice making. We agree with this, however, the timing for operation of this management should be based on regional peak demands; both summer and winter as system peak demand varies from area to area. EPA suggests that this delay could be for 4 hours. We suggest that EPA discuss this further with refrigerator/freezer manufacturers as to whether or not this would affect food products if delayed longer to accommodate peak periods longer than 4 hours. We concur with having a customer override for this function. We recognize that giving customers this ability could negate the demand response.

NRECA thanks you for the opportunity to comment on this proposal.

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