

# Ecodesign Preparatory study on Smart Appliances

## Template for comments and consortium observations on strategic decisions

Date: 13.10.17

Document: **Task 7 – Strategic decisions**

### BEAMA Comments

1	2	3	4	5	6	7
SH <sup>1</sup>	Strategic decision	Reference to section in Task 7 report	Reference to slides	Do you agree with the decision (yes/no)	Comment (justification for your standpoint) by the Stakeholder	In case of disagreement, proposed alternative decision by the Stakeholder
	<b>The labelling option is the preferred policy instrument</b>	7.1.4	„03 Policy approaches“	yes	<p>BEAMA have commented previously stating that industry would favour a labelling scheme that incentivises the market adoption of DSF capable (energy smart) systems, and this should be aligned with other regulatory activities (inc, market design package and EPBD). Manufacturers need to have the choice to apply an 'energy smart' label, and this is especially important given the infancy of the market.</p> <p>Industry would NOT support any minimum requirement set under eco design, and any measure that would see the banning of non-smart appliances in the market. For now we would also NOT support labelling to be applied to non-smart appliances (e.g. similar to Nickle labelling) which was a suggestion in the stakeholder meeting on the 14th September.</p>	
	<b>Direct flexibility interface functionality is MANDATORY, indirect flexibility interface functionality is OPTIONAL, internal measurement interface is OUT of SCOPE.</b>	7.5.5, 7.10.1, 7.10.4	„04 Context and strategic decisions“ and Slides 42 and 45 in „05 Technical requirements“	No?	<p>We are happy with this, providing the criteria for a direct flexibility interface is mandatory only when the manufacturer has chosen to apply the label. In this since it is a voluntary measure for the industry to choose whether to apply or not.</p> <p>An internal measurement interface in the context of this study would include frequency response in Fridge Freezers. At the stakeholder meeting it was confirmed this would be out of scope from this study and would be more applicable under a Network Code, and this should be followed up by ENTSO E. However, when the Demand Connected Code was being drafted this was drafted as a proposal (for FR to be mandatory in fridge freezers). This came under significant criticism from industry as it is not for grid codes to</p>	

					<p>regulate consumer products and this is better suited for Eco Design as a framework directive. It seems as though this needs to be reviewed, and if there is a demand for FR control in Fridge Freezers, the correct mechanism for this needs to be applied.</p> <p>We do not support in any case frequency response being made mandatory for fridge freezers. A lot of work is currently being done to see how frequency response can be managed at a regional level as part of regional frequency response networks i.e separating the FR measurement from the appliance/ home. So it is unnecessary to build in mandatory cost on manufactures to install this type of functionality at the appliance end. We therefore agree with it being kept out of scope of this study. It also makes it difficult to include fridge freezers in more innovative services — they'll get locked into a least common denominator service (the minimum a manufacturer needs to do to get the label).</p>	
	<b>Energy smart appliances should be able to function without the presence of a Home/Customer Energy Manager</b>	<b>7.6.4</b>	<b>„04 Context and strategic decisions“</b>	Yes	<p>We agree that smart appliances should be able to function without the presence of a Home/ Customer Energy Manager. However, we do not agree with the assumption that seems to be made that the standardisation work required for the label shouldn't consider interoperability with the CEM/HEM. Any common data model needs to consider use cases with the CEM/HEM. This is an important part of the likely system architecture that will develop in the UK market. Longer term it is also assumed most domestic flexibility may be provided through a CEM/HEM that provides whole house balancing, and is therefore able to manage the multiple data sources and commands that are necessary to provide benefits to the system and consumer.</p>	
	<b>Energy smart appliances should be able to function without the presence of a Smart Meter</b>	<b>7.6.4, 7.8.7</b>	<b>„04 Context and strategic decisions“ and slide 28 in „05 Technical requirements“</b>	Yes	<p>We agree that smart appliances should be able to function without the presence of a Smart Meter. However, we don't feel the current recommendations and report acknowledge the role smart metering will play in developing the flexibility services outlined in the study. And where this is noted, it doesn't acknowledge the full range of applications different member states may be able to offer. The smart metering</p>	

					<p>program in the UK has been developed to support DSF applications and the Consumer Access Device in the UK will significantly help the development of market services for smart appliances and the evolution of CEM related systems.</p> <p>There are some further issues raised from this regarding assumptions the consultants have made on the requirements for verification data back from appliances, and the frequency of data below 15 minutes required. We have further commented on this in our letter supporting this response.</p>	
	<b>Energy smart appliances should be able to receive instructions from a controller inside and outside the customer home network</b>	<b>7.9.5</b>	<b>„04 Context and strategic decisions“ and slide 40 in „05 Technical requirements“</b>	Yes		
	<b>Split-up in appliances groups with vertical requirements where needed</b>	<b>7.7</b>	<b>„04 Context and strategic decisions“</b>	Yes	<p>We support the approach taken to review vertical product categories . It would be impossible to generate any meaningful criteria for a label if applied horizontally across all product sectors. In our recent letter to VITO we outlined this and the importance of reviewing individual products. Even within the categories identified there will be variations in how the criteria for the label may be applied, e.g. for Lot 2 water heaters.</p>	
	<b>From the thermal appliances group, only thermal appliances including a controller can be considered as energy smart</b>	<b>7.4.1</b>	<b>„04 Context and strategic decisions“</b>	No		<p>BEAMA are concerned that this will create an unfair competitive advantage for products with integrated controllers, and limit functionality available to consumers for DSF. A lot of heating products are sold onto the market today with external controllers (e.g. heat pumps with zoned heating controls). The ability to provide external controllers can allow for more advanced system capabilities. If this was excluded from scope it would mean manufacturers may need to change whole product lines to enable them to apply the energy smart label. This would come at a cost and would inevitably be passed onto the consumer. This strategic decision needs to be reviewed</p>

						and a solution developed for how packages of products are sold into the market with the energy smart label.
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1    **SH** = Stakeholder (enter the abbreviation of the organization)  
**NOTE**    All columns are compulsory (column 7 may be left blank in case of agreement with the decision).

## Template for comments and consortium observations

Document: **Task 7 – Policy and Scenario analysis**

1 **SH** = Stakeholder (enter the abbreviation of the organization)  
2 **Type of comment:** **ge** = general      **te** = technical      **ed** = editorial  
**NOTE** Columns 1, 2, 4, 5 are compulsory.

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## Template for comments and consortium observations

Date:

Document: **Task 1-6 supplementary report**

1	2	(3)	4	5	(6)
SH <sup>1</sup>	Section No./ Subsection No./ Annex (e.g. 3.1)	Page and Paragraph/ Figure/Table/ Note (e.g. p 6 para 5)	Type of com- ment <sup>2</sup>	Comment (justification for change) by the Stakeholder	Proposed change by the Stakeholder

<sup>1</sup> **SH** = Stakeholder (enter the abbreviation of the organization)

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