



Shaping Tomorrow's
Built Environment Today

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August 23, 2019

Mr. Bruce J. Walker
Assistant Secretary
Office of Electricity
U.S. Department of Energy
1000 Independence Avenue SW
Washington, DC 20585
E-mail: Process.Rule@ee.doe.gov

**Re: Response to RFI
Guidance for Enhancing Grid Resilience
“Codes, Standards, Specifications, and Other Guidance for Enhancing the Resilience of
Electric Infrastructure Systems Against Severe Weather Events”**

Dear Mr. Walker:

Thank you for the opportunity to submit information and resources to the U.S Department of Energy (DOE) in response to the Notice of Request for Information, published in the July 9, 2019 Federal Register entitled, “Codes, Standards, Specifications, and Other Guidance for Enhancing the Resilience of Electric Infrastructure Systems Against Severe Weather Events.” We appreciate that DOE is gathering “relevant consensus-based codes, specifications, and standards,” for the purpose of making this information broadly available to interested policy officials and other decisions-makers.

ASHRAE, founded in 1894, is a technical society advancing human well-being through sustainable technology for the built environment. The Society and its more than 57,000 individual members worldwide focus on building systems, energy efficiency, indoor air quality, refrigeration and sustainability. Among many other activities, ASHRAE develops voluntary, consensus-based standards in its fields of expertise to guide industry in the delivery of goods and services to the public. ASHRAE is accredited by the American National Standards Institute (ANSI) and follows ANSI's requirements for due process and standards development.

The **ANSI/ASHRAE/NEMA Standard 201-2016, “Facility Smart Grid Information Model”** should be considered for inclusion in DOE’s catalogue of information to enhance grid resilience. The Facility Smart Grid Information Model (FSGIM) is an abstract representation to account for the reality that the

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technology used to manage a facility may be different depending on the type of facility. The FSGIM is intended to be used to develop or enhance other standards that define technology and communication protocol, which is critical to the building-grid intersection. Smart grids and smart buildings can provide improved resilience through load-shifting and information-sharing. However, the extent to which these systems can truly be interconnected depends on having a common basis for communication, which is what Standard 201 provides. The standard also supports the development of interoperability and cybersecurity standards for a smart nationwide grid. By guiding the development of control technologies through use of this standard, the facility controls can meet the needs of a smart-grid environment.

Thank you for your consideration of this information. Please do not hesitate to contact me if you have any questions or need additional information.

Sincerely,

A handwritten signature in black ink, appearing to read 'JH Littleton', with a horizontal line extending to the right.

Jeff H. Littleton