



# DENVER AMENDMENT PROPOSAL FORM FOR PROPOSALS TO THE 2019 DENVER BUILDING CODE AMENDMENTS AND THE 2021 INTERNATIONAL CODES

**DENVER**  
THE MILE HIGH CITY

## 2021 CODE DEVELOPMENT CYCLE

1) **Name:** Courtney Anderson **Date:** 10/12/2021  
**Email:** [Courtney.Anderson@denvergov.org](mailto:Courtney.Anderson@denvergov.org) **Representing (organization or self):**  
**City Staff Proposal (check box):**

2) One proposal per this document is to be provided with clear and concise information.

Is a separate graphic file provided ( "X" to answer): \_\_\_ Yes or No

3) Highlight the code and acronym that applies to the proposal

<u>Acronym</u>	<u>Code Name</u>	<u>Acronym</u>	<u>Code Name</u>
DBC-AP	Denver Building Code–Administrative Provisions	IPC	International Plumbing Code
IBC	International Building Code	IRC	International Residential Code
<b>IECC</b>	International Energy Conservation Code	IFGC	International Fuel Gas Code
IEBC	International Existing Building Code	IMC	International Mechanical Code
IFC	International Fire Code	DGC	Denver Green Code

## AMENDMENT PROPOSAL

Please provide all the following items in your amendment proposal.

**Code Sections/Tables/Figures Proposed for Revision:**

**Instructions:** If the proposal is for a new section, indicate (new), otherwise enter applicable code section.  
 C404.11

**Proposal:**

**Instructions:** Show the proposal using ~~strikeout~~, underline format.

**Place an "X" next to the choice that best defines your proposal:**  Revision  New Text  Delete/Substitute  Deletion

*Add the following sections and renumber the following equations:*

*Add new definitions as follows:*

**DEMAND RESPONSE SIGNAL.** A signal that indicates a price or a request to modify electricity consumption for a limited time period.

**DEMAND RESPONSIVE CONTROL.** A control capable of receiving and automatically responding to a demand response signal.

*Add new section as follows:*

**Demand Responsive Water Heating.** Electric storage water heaters with rated water storage volume between 40 and 120 gallons and a nameplate input rating equal to or less than 12kW shall be provided with demand responsive controls that comply with ANSI/CTA-2045-B Level 2 or another equivalent approved standard.

**Exceptions:**

1. Water heaters that provide a hot water delivery temperature of 180°F (82°C) or greater
2. Water heaters that comply with Section IV, Part HLW or Section X of the ASME Boiler and Pressure Vessel Code
3. Water heaters that use 3-phase electric power
4. Storage water heaters with *demand response controls* that comply with ANSI/CTA-2045-A or ANSI/CTA-2045-B Level 1, that are also capable of initiating water heating to meet the temperature set point in response to a *demand response signal*.

**Supporting Information (Required):**

All proposals must include a written explanation and justification as to how they address physical, environmental, and/or customary characteristics that are specific to the City and County of Denver. The following questions must be answered for a proposal to be considered.

**Purpose:** What does your proposal achieve?

This proposal requires that all storage tank water heaters installed in residential buildings be compatible with the ANSI/CTA-2045-B grid flexibility / demand response protocol.

**Reason:** Why is your proposal necessary?

Grid flexibility is one of the four foundations of “Denver’s Net Zero Energy (NZE) New Buildings & Homes Implementation Plan.” With increasing penetrations of intermittent renewable energy, volatile wholesale power prices, and subsequent growth in dynamic rates/demand response programs, grid-interactive end uses present an opportunity to help homes manage their bills, participate in programs, and support efficient grid operations. Water heaters can provide many services to the grid, including generation, transmission, and distribution capacity, energy arbitrage, and ancillary services.

As electricity systems transform to include more variable wind and solar energy, demand flexibility becomes increasingly critical to both grid operation and further transformation. Building systems that can use energy when it is abundant, clean, and low-cost not only help decarbonize the entire energy system, they also insulate their owners from future increases in demand charges and peak hour energy rates – a current and accelerating trend. Water heaters offer an unparalleled opportunity for load shifting: tanks full of hot water are inherently energy storage devices. Including the controls necessary to take advantage of this opportunity is relatively simple and affordable in new construction. Compared to other energy storage technologies such as batteries, smart, grid-integrated water heater controls can deliver substantial dispatchable (that is, reliable to the grid operator) energy flexibility. The controls specified by ANSI/CTA-2045-B ensure negligible risk of occupant disruption (that is, the hot water will not run out). Water heaters provide a particularly attractive option as they have inherent thermal storage that allows energy consumption to be shifted with little to no impact to the end user. This capability has been demonstrated in several contexts, most recently through regional demonstrations conducted by EPRI and BPA<sup>1</sup>.

In their Grid-interactive and Efficient Buildings (GEBs) Roadmap, the US Department of Energy<sup>2</sup> estimates that approximately 15 GW of additional load flexibility is expected to be added to the system under reference case assumptions. Combined with energy efficiency, this is expected to provide \$13 billion/year of peak demand savings to the power system and its customers. Through a comprehensive literature review and interviewing dozens of national experts, the USDOE team found that one of the biggest barriers was the lack of interoperability. A key tool to solve this problem is building codes, which can help to ensure that interoperable devices and controls are installed at the time of construction. USDOE cited explicitly the use of codes and standards as one of its recommended pathways to enable greater adoption of GEBs technologies.

It is important to include the requirement for two-way communication (specifically, communication from the behind-the-meter control module back to the utility, grid operator, or other third-party entity) because this communication ensures that the controls capability can be fully deployed when needed. With legacy demand response systems, a signal is sent out but the ability to track and quantify the impacts of that signal is effectively nonexistent. This one-way communication paradigm is a key reason that the “firmness” or reliability of many

<sup>1</sup> BPA, CTA-2045 Water Heater Demonstration Report (2018) <https://www.bpa.gov/EE/Technology/demand-response/Documents/Demand%20Response%20-%20FINAL%20REPORT%20110918.pdf>

EPRI, CEA-2045 Field Demonstrations Project Description (2014) <https://www.epri.com/research/products/000000003002004009>

<sup>2</sup> USDOE, A National Roadmap for Grid-Interactive Efficient Buildings (2021) <https://gebroadmap.lbl.gov/A%20National%20Roadmap%20for%20GEBs%20-%20Final.pdf>

flexibility-related demand side management strategies, particularly demand response, is often considered to be very low. However, a two-way communication paradigm enables much more reliable impact tracking. Buildings whose controls include two-way communication capability, that is, those with grid-interactive controls as defined here, will be better able to participate in the demand response programs of the future, and their owners will have improved financial prospects through enhanced ability to participate in potentially lucrative utility demand response programs.

ANSI/CTA-2045-B standardizes the socket, and communications protocol, for electric water heaters so they can communicate with the grid, and with demand response signal providers. In addition, 2045-B adds control and communications requirements for mixing valves in water heaters, which enable them to provide greater storage capacity to support increased load shifting while eliminating scalding risk.

Versions of this standard are included in codes or other requirements in California, Oregon, and Washington and are referenced explicitly by ENERGY STAR.

**Substantiation:** Why is your proposal valid? (i.e. technical justification)

This proposal requires that electric water heaters with integrated storage tanks have demand responsive controls. This functionality allows water heaters to “float” during periods of high demand and resume heating water after the high demand period is over or when water temperatures in the tank drop to the lower limit of acceptable temperature. ANSI/CTA-2045 is the industry standard for grid-flexible controls for water heaters, but the requirement allows for other protocols to be approved by the building official.

The requirement is limited to electric water heaters with integrated storage tanks. It also only applies to water heaters over 40 gallons and under 120 gallons in order to exclude small, point-of-use water heaters. Finally, it excludes “heavy duty” water heaters as defined by the ASME Boiler and Pressure Vessel Code or that use three-phase power; this ensures that these requirements do not apply to water heaters intended to support process loads for which DR controls are neither appropriate nor available.

CTA-2045-B is an updated version of CTA-2045-A. Level 2 in that standard provides robust grid interactivity. Level 1 corresponds to the older CTA-2045-A and provides only much simpler “load shedding” functionality. As manufacturers are still implementing CTA-2045-B Level 2, the proposal includes an exception that allows for compliance with the older standard as long as the water heater is also capable of the most critical feature of Level 2: “load up” (preheating before a load shed event). Currently, Rheem and AO Smith have models that comply with CTA-2045-A and this additional functionality fall. The exception will bridge the gap between what is currently available on the market and the full adoption of -B by the market. As -B models become more widely available, the exception will not be necessary.

Since this requirement is part of the construction code, it will not require buildings to participate in any demand response programs. But it will ensure that buildings are capable of participating, so that Denver buildings will be able to help integrate building loads with available production.

The proposal also adds an additional line to Table R406.2, ensuring that this requirement is included in the ERI approach.

This proposal is identical to one that was recently voted for approval in the WA state commercial energy code process. It was developed through extensive negotiation with AHRI (American Heating and Refrigeration Institute, the manufacturer trade association) in order to remove their objections to the inclusion of these controls in the code.

**Bibliography and Access to Materials** (as needed when substantiating material is associated with the amendment proposal):

BPA, CTA-2045 Water Heater Demonstration Report (2018) <https://www.bpa.gov/EE/Technology/demand-response/Documents/Demand%20Response%20-%20FINAL%20REPORT%20110918.pdf>

EPRI, CEA-2045 Field Demonstrations Project Description (2014) <https://www.epri.com/research/products/000000003002004009>

USDOE, A National Roadmap for Grid-Interactive Efficient Buildings (2021) <https://gebroadmap.lbl.gov/A%20National%20Roadmap%20for%20GEBs%20-%20Final.pdf>

Washington State Revised Code of Washington, Title 19, Chapter 19.260, Section 19.260.080, available at <https://app.leg.wa.gov/RCW/default.aspx?cite=19.260.080>

Oregon Department of Energy, Energy Efficiency Standards Rulemaking <https://www.oregon.gov/energy/Get-Involved/Pages/EE-Standards-Rulemaking.aspx>

U.S. EPA Energy Star Program, Connected Criteria for ENERGY STAR Products, [https://www.energystar.gov/products/spec/connected\\_criteria\\_energy\\_star\\_products\\_pd](https://www.energystar.gov/products/spec/connected_criteria_energy_star_products_pd)

**Other Regulations Proposed to be Affected**

**\*For proposals to delete content from the 2019 Denver Green Code in conjunction with adding it to other mandatory Denver codes and/or regulations, only.**

Please identify which other mandatory codes or regulations are suggested to be updated (if any) to accept relocated content.

**None**

