April 1, 2024

Attn: Keith Benes, Office of Policy
Department of Energy
1000 Independence Avenue Soutwest
Washington, District of Columbia 20585

RE: **Comments of ACT | The App Association to the United States Department of Energy on its Notice of Request for Information Related to DOE's Responsibilities on Safe, Secure, and Trustworthy Development and Use of Artificial Intelligence (89 FR 15196)**

ACT | The App Association (App Association) appreciates the opportunity to submit views to the Department of Energy (DOE) in support of its implementation of the Administration's Executive Order (EO) 14110 on Safe, Secure, and Trustworthy Development and Use of Artificial Intelligence (AI), including its development of a public report describing the potential for AI to improve planning, permitting, investment, and operations for electric grid infrastructure and to enable the provision of clean, affordable, reliable, resilient, and secure electric power to all Americans.

The App Association represents thousands of small business software application development companies and technology firms that create the technologies that drive internet of things (IoT) use cases across consumer and enterprise contexts. Today, the value of the ecosystem the App Association represents – which we call the app economy – is approximately $1.7 trillion and is responsible for 5.9 million American jobs, while serving as a key driver of the $8 trillion internet of things (IoT) revolution. Alongside the world's rapid embrace of mobile technology, our members create the innovative solutions that power IoT across modalities and segments of the economy. NIST's planned voluntary artificial intelligence risk management framework (AI RMF)—and the efforts of numerous agencies with respect to AI policy and regulation—directly impacts the app economy. We support the goals set forth in the AI EO, and DOE's efforts to carry out their responsibilities set forth in it.

The App Association agrees that, with the right enabling environment, ecosystem of market actors, and investments, AI technologies can foster greater efficiency and accelerated development for U.S. energy grid operations and reliability through improvements across predictive maintenance, load balancing, processing of growing interconnection queues and handling of distribution-side generation/demand-side interconnection, detection and diagnosis of anomalous/malicious events, and other areas.

AI is an evolving constellation of technologies that enable computers to simulate elements of human thinking – learning and reasoning among them. An encompassing term, AI entails a range of approaches and technologies, such as Machine Learning (ML) and deep learning, where an algorithm based on the way neurons and synapses in the brain change due to exposure to new inputs, allowing independent or assisted decision making.

AI-driven algorithmic decision tools and predictive analytics are having, and will continue to have, substantial direct and indirect effects on Americans. Some forms of AI are already being used to improve American consumers' lives today – for example, AI is used to detect financial and identity theft and to protect the communications networks upon which Americans rely against cybersecurity threats. Moving forward, across use cases and sectors, AI has incredible potential to improve American consumers' lives through faster and better-informed decision making, enabled by cutting-edge distributed cloud computing. As an example, healthcare treatments and patient outcomes stand poised to improve disease prevention and conditions, as well as efficiently and effectively treat diseases through automated analysis of x-rays and other medical imaging. From a governance perspective, AI solutions will derive greater insights from infrastructure and support efficient budgeting decisions.

Today, Americans encounter AI in their lives incrementally through the improvements they have seen in computer-based services they use, typically in the form of streamlined processes, image analysis, and voice recognition (we urge consideration of these forms of AI as "narrow" AI). The App Association notes that this "narrow" AI already provides great societal benefit. For example, AI-driven software products and services revolutionized the ability of countless Americans with disabilities to achieve experiences in their lives far closer to the experiences of those without disabilities.

Nonetheless, AI also has the potential to raise a variety of unique considerations for policymakers. The App Association appreciates the efforts to develop a policy approach to AI that will bring its benefits to the energy sector, balanced with necessary safeguards to protect supply chains and consumers. To assist DOE and other policymakers, the App Association has appended a comprehensive set of AI policy principles for consideration.[1] The App Association strongly encourages DOE to align its report recommendations with the principles we have developed based on the consensus of our diverse and innovative membership, as well as the National Institute of Standards and Technology's flexible, risk-based, outcome-focused, and cost-effective AI Risk Management Framework,[2].

The App Association appreciates DOE's consideration of the above views. AI offers immense potential for widespread societal benefit, which is why DOE's report and policies should responsibly foster investment and innovation in any way practicable. Our members both use and develop AI solutions. As the energy sector moves to adopt AI

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[1] **Appendix A**, *ACT | The App Association's Policy Principles for Artificial Intelligence*.

[2] https://www.nist.gov/itl/ai-risk-management-framework.

technologies on a greater scale, it is important that the small business developers who power the global app economy can contribute to this important trend.

We urge DOE to contact the undersigned with any questions or ways that we can assist moving forward.

Sincerely,

Brian Scarpelli
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