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**Information Technology Industry Council Comments on Voluntary
Performance Framework for Low-Power Modes Version One point
Zero**

Additional submitted attachment is included below.

July 14, 2026

Ho Hwang
California Energy Commission
Docket No. 17-AAER-12
715 P Street, MS-4
Sacramento, CA 95814

ITI Comments on Voluntary Performance Framework for Low-Power Modes Version 1.0 (Docket 17-AEER-12)

Dear Commission Staff:

The Information Technology Industry Council (ITI), on behalf of our members, respectfully submits the following comments in response to the Voluntary Performance Framework for Low-Power Modes Version 1.0. In this comment, ITI specifically focuses on the draft framework's data collection plan for imaging equipment product categories.

ITI is the premier global advocate for technology, representing the world's most innovative companies. Founded in 1916, ITI is an international trade association with a team of professionals on four continents. We promote public policies and industry standards that advance innovation worldwide. Our diverse membership and expert staff provide policymakers with the broadest perspective and thought leadership from technology, hardware, software, services, and related industries. ITI has a long history of working with the California Energy Commission (CEC) and other governmental entities on energy efficiency issues, and our members have driven and shaped energy efficiency standards and specifications for decades.

ITI appreciates CEC's effort to drive energy efficiency improvements for low-power modes. ITI is pleased to see that part of our feedback to CEC's Request for Information in 2024 was considered and adopted in this latest iteration. Specifically, we applaud the CEC for adopting the ENERGY STAR test method for imaging equipment. By adopting the ENERGY STAR test method for imaging equipment, manufacturers will find it easier and more cost-effective to participate in data reporting.

However, ITI has a few outlying concerns, questions, and suggestions regarding the draft framework to improve the voluntary data collection process and identify areas of consumer energy savings without placing overdue burdens on industry.

Limited Energy Savings Opportunity for Imaging Equipment

Since CEC's project was started in 2017, imaging equipment products have undergone major reductions in standby and sleep power through technological advancements in power management integrated circuits, sleep and standby architectures, and firmware-based power optimization. Additionally, ENERGY STAR iterations have already driven substantial efficiency

gains. Low-power modes power consumption is now de minimis relative to active mode consumption. Therefore, ITI expects that the imaging equipment category is unlikely to yield incremental energy savings. As CEC continues to refine in-scope products, ITI recommends that CEC reassess whether imaging equipment should remain an “in-scope, in-focus” product category, as imaging equipment may no longer represent a priority category for substantial potential energy savings.

Additionally, ITI recommends that CEC explicitly exclude professional imaging products used for commercial purposes and large-format imaging equipment from the scope, because they are low-volume, niche products with more complex architecture. ENERGY STAR Imaging Equipment v3.2 already reflects this differentiated treatment. Similar to the EU standby and low power regulations, as well as ensuring alignment with the other products identified in the product category, CEC should limit the scope to high-volume, consumer-relevant products to maximize impact and achieve the framework’s objectives.

Data Verification and Performance Target Methodology

ITI is concerned about the lack of detail in the draft framework on data integrity and verification. How would CEC ensure the integrity and accuracy of data submitted? Will submissions be audited or independently verified? Will third-party test lab data be required or accepted? How will inconsistencies across manufacturers be resolved? If CEC does not address these core issues, the data submitted will risk being inconsistent and incomparable. Moreover, CEC has not detailed how it plans to translate collected data into voluntary performance targets. A methodology that defines the statistical approach, treatment of outliers and niche products, and consideration of functional and technical constraints would need to be determined prior to large-scale data collection, as is consistent with best practices used in ENERGY STAR specification development, EU Ecodesign and standby regulations, and past CEC rulemakings. A clear and predefined methodology is needed to ensure that data collected by industry will be effectively used.

Criteria for Regulatory Action

ITI is concerned about the lack of clarity in the process for promulgating regulations. The draft framework briefly describes the process that in the case that participation targets have not been met, the CEC will work collaboratively with industry to build an improvement plan; if an agreement cannot be reached or satisfactory progress cannot be made on an improvement plan, then regulatory action is warranted. ITI is concerned that this language is overly vague and does not outline the components of an improvement plan, the criteria for “satisfactory progress”, and how CEC plans to set minimum performance standards. It is imperative that CEC details its criteria for how this process could lead to regulation and what CEC’s methodology would be for translating collected data into standards. CEC should provide a transparent and detailed plan for its methodology and qualifying process for regulatory action to reduce regulatory uncertainty for industry and uphold the credibility of this process.

Thank you for taking our feedback into consideration. ITI stands ready to work with CEC on this effort.

Sincerely,



Caroline Li
Manager of Policy, Energy and Environment