

DOCKETED	
Docket Number:	17-AAER-12
Project Title:	Low-Power Mode
TN #:	271446
Document Title:	California Investor Owned Utilities Comments - California Investor Owned Utilities - Voluntary Performance Framework for Low-Power Modes Comments
Description:	N/A
Filer:	System
Organization:	California Investor Owned Utilities
Submitter Role:	Public
Submission Date:	7/14/2026 6:06:34 PM
Docketed Date:	7/15/2026

*Comment Received From: California Investor Owned Utilities
Submitted On: 7/14/2026
Docket Number: 17-AAER-12*

California Investor Owned Utilities - Voluntary Performance Framework for Low-Power Modes Comments

This letter comprises the comments of the Pacific Gas and Electric Company (PG&E), San Diego Gas and Electric (SDG&E), and Southern California Edison (SCE), collectively referred to herein as the California Investor-Owned Utilities (CA IOUs), in response to the California Energy Commission (CEC) draft staff report for the Voluntary Performance Framework for Low-Power Modes (VPF-LPM).

Additional submitted attachment is included below.



July 14, 2026

Ho Hwang
California Energy Commission
715 P Street
Sacramento, CA 95814

Topic: Draft Staff Report for Voluntary Performance Framework for Low-Power Modes

Docket Number: 17-AAER-12
TN Number: 270023

Dear Commission Staff:

This letter comprises the comments of the Pacific Gas and Electric Company (PG&E), San Diego Gas and Electric (SDG&E), and Southern California Edison (SCE), collectively referred to herein as the California Investor-Owned Utilities (CA IOUs), in response to the California Energy Commission (CEC) draft staff report for the Voluntary Performance Framework for Low-Power Modes (VPF-LPM).

The CA IOUs comprise some of the largest utility companies in the nation, serving over 32 million customers in the Western U.S. We are committed to helping customers reduce energy costs and consumption, while striving to meet their evolving needs and expectations. Therefore, we advocate for standards that accurately reflect the climate and conditions of our respective service areas.

We respectfully submit the following comments to the California Energy Commission:

1. The CA IOUs support the CEC's continued advancement of the VPF-LPM.

The CA IOUs consider the VPF-LPM a valuable resource for understanding inactive power and supporting energy-efficiency improvements across a wide range of product categories. Achieving significant energy savings from inactive power necessitates broad "horizontal" policy approaches such as the VPF-LPM. We encourage the CEC to demonstrate the success of this innovative, voluntary approach, as it could expand the range of available policy tools for achieving energy savings. A flexible, adaptable, and iterative voluntary framework can be well-suited to this rapidly evolving area, if in practice it can achieve sufficient industry participation and product performance improvement.

2. The CA IOUs support the CEC's use of the Data Collection Procedure (DCP) as the primary mechanism for collecting whole-product inactive power and product functionality data.

The CA IOUs believe the DCP is an effective tool for gathering consistent data across a broad range of product categories, enabling the CEC to better understand and reduce inactive power consumption

while preserving product functionality. We also support the CEC's decision to evaluate and implement targeted exceptions to the DCP when appropriate, as the CEC has proposed in the VPF-LPM 1.0 with imaging equipment.

3. The CA IOUs support the CEC's approach to define in-focus product categories, establish participation targets, and provide additional clarity on the VPF-LPM process and next steps.

The CA IOUs find this increased clarity and definition valuable. We consider the CEC's proposed in-focus scope, participation targets, and process to be reasonable. We also support the CEC's goal of collecting adequately representative data for each in-focus product category.

The CA IOUs appreciate the opportunity to provide these comments regarding the draft staff report for the VPF-LPM. We thank the CEC for its consideration and look forward to the next steps in the process.

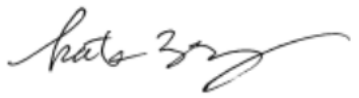
Sincerely,



Rob Bohn
Manager, Codes & Standards
Pacific Gas and Electric Company



Scott Higa
Acting Sr. Manager, Codes and Standards
Southern California Edison



Kate Zeng
ETP/C&S/ZNE Manager
Customer Programs
San Diego Gas & Electric Company