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ITI Comments IEPR Staff Workshop Re Plug Load Efficiency

Additional submitted attachment is included below.

July 2, 2015

California Energy Commission
Dockets Office, MS-4
1516 Ninth Street
Sacramento, CA 95814-5512

Re: 2015 IEPR Plug Load Efficiency Docket No. 15-IEPR-05

Introduction

The Information Technology Industry Council (ITI) appreciates the opportunity to provide input and recommendations in response to questions and issues raised in the California Energy Commission (CEC) staff workshop to explore strategies for increasing plug load efficiency in existing buildings as part of the 2015 Integrated Energy Policy Report.[1] The ICT industry has a proven track record in advancing policies and practices that help improve the efficiency of our products as well as to leverage ICT to improve the efficiency of other more energy intensive sectors through intelligent efficiency. As just one example of increasing product efficiency, ITI recently submitted extensive comments detailing the significant progress made in increasing both the improved performance and energy efficiency of computers.[2] Beyond improving the efficiency of our own sector, the GeSI SMARTer2030 Report found, "ICT can enable a 20 percent reduction of global CO_2e emissions by 2030, holding emissions at 2015 levels," and "ICT emissions as a percentage of global emissions – and in absolute quantities – will decrease over time."[3]

Improved product efficiency and intelligent efficiency requires an intelligent policy environment that provides the flexibility to innovate the solutions needed to address the demands of an increasingly connected world while also improving the energy productivity of our technologies. Based on our global experience with a number of different mandatory and

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[1] *See* Notice of June 18 IEPR CEC Staff Workshop on Plug Load Efficiency, June 3, 2015, available at:
http://docketpublic.energy.ca.gov/PublicDocuments/15-IEPR-05/TN204889_20150603T154816_Notice_of_IEPR_Staff_Workshop_on_Plug_Load_Efficiency.pdf.
[2] See ITI/Technet Comments on CEC Staff Report for Draft Computer Standards, June 1, 2015, available at http://docketpublic.energy.ca.gov/PublicDocuments/14-AAER-02/TN204797_20150601T093456_ITITechNet_Comments_on_CEC_Staff_Report_for_Draft_Computer_Stan.pdf.
[3] *See* GeSI SMARTer2030 Report, available at http://gesi.org/portfolio/project/82.

Information Technology Industry Council
1101 K St, NW Suite 610, Washington, D.C. 20005
T +1 (202) 737-8888, www.itic.org

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voluntary approaches, ITI offers the following input in response to both the questions and issues raised concerning the CEC's role in leveraging the ICT sector to improve energy efficiency.

Discussion

1. **What should be the Energy Commission's focus when identifying, considering and developing new appliance efficiency standards?**

Scope: Given the complexity, configurability and rapid change of ICT products, the CEC should exercise extreme caution when contemplating mandating the amount of energy a specific ICT product can use. Even with mature, single function technologies like battery chargers where the CEC has an existing standard, our industry continues to see innovation and increased functionality that could be limited by prematurely setting an energy limit. Beyond battery chargers, the CEC has already mentioned computers, monitors, displays, game consoles, network equipment and set-top boxes as possible products where the CEC is considering new appliance efficiency standards. If the CEC, with stakeholder input, decides that there are grounds for a new appliance efficiency standard in one of these categories, ITI recommends that the CEC utilize appropriate and narrow product categories. ICT products require significant categorization, over other single function products, to ensure that products with similar capabilities are grouped together. Where necessary, ITI also recommends that the CEC focus on technologies that have not already implemented power management, when the product/equipment is not performing its main function. For product types where power management is implemented but disabled by end users, CEC should understand the root cause for user behavior and incentivize end users to adopt power management through an education and outreach campaign.

Data: The CEC needs to ensure that energy efficiency standards for ICT products are based on accurate data and sound analysis. The US EPA ENERGY STAR program accumulates significant amounts of third-party tested data as well as data based on EPA's research, data provided by manufacturers, and EPA's consultants. ITI recommends that the CEC leverage ENERGY STAR and actual California system shipment data at each step of the process in determining whether an appliance standard is necessary as well as in the development of the standard itself. Relying on limited data samples from other entities as the basis for forecast and analysis will create the possibility of significant flaws in the decision to promulgate a standard.

Technology Mandates: During the workshop, a recommendation was raised by non-industry speakers that the CEC should contemplate taking a greater role in mandating specific technologies as part of an appliance efficiency standard. Specific examples included mandating mobile device technologies in non-mobile devices and mandating products be manufactured

with energy reporting capabilities. ITI strongly recommends against specific technology mandates as part of an appliance efficiency standard. In an industry that is constantly innovating to develop new products to meet changing market needs, a regulation that picks winning and losing technologies based on what is currently available on the market will create inequities and market entry barriers.

2. **How can the Energy Commission/California move the plug-load market towards more energy efficient products?**

    ITI recommends that the CEC and California take a broader approach to leverage greater energy efficiency from ICT products than what is available through an appliance efficiency standard regulatory process. Industry has a proven track record of designing more energy efficient products in response to customer needs and in response to voluntary programs like ENERGY STAR. The CEC could work with others in the State to play a stronger role in educating and providing incentives for consumers to purchase more energy efficient products.

    Education: The CEC can partner with other agencies and help educate both consumers and businesses on energy efficiency gains that can be achieved by using power management features already provided by manufacturers and enabled by default as shipped.

    Incentives: The CEC can help encourage the provision of incentives to companies and consumers to upgrade to more energy efficient ICT products, specifically ENERGY STAR qualified products.

3. **How can California influence more stringent federal efficiency standards and ENERGY STAR specifications?**

    For ICT equipment, the ENERGY STAR program has proven very effective in encouraging the production of more energy efficient products. California has been reaping the benefits of these programs for many years. ITI recommends that the CEC could have significant influence as a stakeholder in the ENERGY STAR specification development process. The EPA runs an inclusive, transparent, voluntary and responsive process. By joining the specification development process, the CEC, as a stakeholder, could help guide the development of ENERGY STAR specifications and assist in the adoption rate to these specifications.

4. **How can the Energy Commission encourage demand response capability in plug loads?**

Industry is actively developing and integrating demand response intelligence into plug loads. ITI believes CEC research, development of consumer benefit models[4], integration to building/home management, education and outreach encouraging the deployment of demand response technologies will help speed adoption.

Conclusion

ITI looks forward to continued engagement with the CEC and other stakeholders to explore strategies for increasing plug load efficiency.

Sincerely,

Joseph Andersen
Director, Environment & Sustainability
Information Technology Industry Council
Office: 202-626-5729 / Email: jandersen@itic.org
www.itic.org

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[4] Programs such as CalPlug at CalIT/UC-Irvine offer venues for industry and academia to perform technology usage benefit studies as it relates to energy efficiency.