

## DOCKETED

<b>Docket Number:</b>	16-AAER-02
<b>Project Title:</b>	Appliance Efficiency Rulemaking for Computers, Computer Monitors, and Signage Displays
<b>TN #:</b>	214154
<b>Document Title:</b>	Northwest Energy Efficiency Alliance (NEEA) Comments: On Appliance Efficiency Rulemaking for Computers, Computer Monitors, and Signage Displays
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<b>Organization:</b>	Northwest Energy Efficiency Alliance (NEEA)
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*Comment Received From: Northwest Energy Efficiency Alliance (NEEA)*

*Submitted On: 10/24/2016*

*Docket Number: 16-AAER-02*

**On Appliance Efficiency Rulemaking for Computers, Computer Monitors, and Signage Displays**

*Additional submitted attachment is included below.*

October 24<sup>th</sup>, 2016



California Energy Commission  
1516 Ninth Street, MS-29  
Sacramento, CA 95814-5512

**RE: Docket Number 16-AAER-02. Appliance Efficiency Rulemaking for Computers, Computer Monitors, and Signage Displays.**

Dear Commissioner McAllister,

Northwest Energy Efficiency Alliance (NEEA) is a non-profit organization working to encourage the development and adoption of energy-efficient products and services. NEEA is supported by the region's electric utilities, public benefits administrators, state governments, public interest groups and efficiency industry representatives. This unique partnership has helped make the Northwest region a national leader in energy efficiency. NEEA has a history of championing energy efficiency work on computers that dates to 2004 when NEEA funded the 80 Plus utility incentive program for efficient internal computer power supplies. The 80 Plus program achieved broad industry support and paved the way for the establishment of ENERGY STAR on-mode power requirements. NEEA applauds the efforts by the California Energy Commission, industry and advocacy stakeholders to develop a Title 20 proposal for computers and monitors that shows signs of broad stakeholder support. The proposed base allowance levels and several key adders are more stringent than ENERGY STAR levels, and the CEC proposal includes important test method improvements.

However, like Natural Resources and Defense Council (NRDC) and Appliance Standards Awareness Project (ASAP), NEEA recommends that the Commission mitigate specific risks associated with this proposal. NEEA is concerned that some of the proposed allowance levels and exemptions may be too generous given historical power reduction curves for new computer and monitor technologies. To mitigate this risk, NEEA recommends a) tighter levels, particularly for Tier 2, for the allowances and exemptions identified by NRDC in their written comments dated October 24, 2016, and b) a pro-active mechanism—or off-ramp—to reevaluate and adjust levels if needed as technologies evolve. NEEA supports NRDC's proposed off-ramp concept, which would involve sun-setting allowances 12 months after a feature achieved significant, perhaps 10%, market share. NEEA also requests additional transparency into the assumed market adoption rates and data set analysis used to develop proposed adders and exemptions. NEEA's technical consultants have performed market and technical analyses of enhanced performance displays (EPD) and very high performance monitors and have worked with NRDC to integrate the findings of this research into NRDC's comprehensive comments dated October 24, 2016.

NEEA views this rulemaking as an important step in our collective efforts to mitigate the effects of climate change and encourages the Commission to look more carefully at ways to increase the confidence level that needed energy savings will occur in future years. NEEA appreciates the opportunity to offer these

comments to the Commission. Thank you for considering them in the development of rules for computers, computer monitors, and signage displays.

Sincerely,

A handwritten signature in black ink, appearing to read "Charlie M. Stephens". The signature is fluid and cursive, with the first name "Charlie" being the most prominent.

**Charlie Stephens**

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