

DOCKETED

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Project Title:	Appliance Efficiency Rulemaking for Computers, Computer Monitors, and Signage Displays
TN #:	214165
Document Title:	Northeast Energy Efficiency Partnerships (NEEP) Comments for Computers, Monitors, and Displays Standard
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Comment Received From: Claire Miziolek

Submitted On: 10/24/2016

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Northeast Energy Efficiency Partnerships (NEEP) Comments for Computers, Monitors, and Displays Standard

Additional submitted attachment is included below.



Commissioner Andrew McAllister
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512

October 24, 2016

Re: Docket No. 14-AAER-2

Dear Commissioner McAllister,

Northeast Energy Efficiency Partnerships (NEEP) is a regional energy efficiency organization working to advance energy efficiency in the Northeast and Mid-Atlantic United States. NEEP appreciates the opportunity to provide comments to the California Energy Commission (CEC) on the Computers, Computer Monitors, and Signage Displays rulemaking, Docket No. 14-AAER-2. As has been mentioned in prior comment letters, NEEP is monitoring this rulemaking as the steps taken in California to set efficiency standards for these products will have implications for the rest of the nation and may ultimately impact these products in home and businesses in the Northeast. CEC standards have resulted in significant improvements in the efficiency of several products over the years and the standards have been implemented very successfully. NEEP applauds the CEC on their national leadership in standards, especially for plug load and electronics categories that have such rapid technological evolution that regulation can be challenging. We respectfully submit the following comments.

Overall, while NEEP is very supportive of the CEC for taking this rulemaking on, we echo the concerns that have been expressed through comment letters from the Natural Resources Defense Council (NRDC) and the Appliance Standards Awareness Project (ASAP). We too are concerned about the extended compliance timeline and potential loopholes with allowances and exemptions. Timeline is a critical issue that has in many cases eluded the setting of standards for consumer electronics. As ASAP's comment letter describes, there have been several documented cases of standards loopholes being exploited. We support the core components of this standard and believe with realistic changes as outlined by NRDC, the standard could reach full impact. We do hope that the final rule is issued in short order with consideration with the suggested revisions from NRDC.

Once again, NEEP is grateful for the opportunity to provide comments on the Computers, Computer Monitors, and Signage Displays rulemaking. Please don't hesitate to contact me with any questions or clarifications.

Sincerely,

A handwritten signature in black ink, appearing to read 'Claire Miziolek', with a long horizontal flourish extending to the right.

Claire Miziolek
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