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Broaden Procedure to Include dump devices too

Home Energy Analytics (HEA) uses smart meter data to identify high "home idle loads" and help CA residents reduce this wasted energy through simple measures. In 2015 we collaborated with the NRDC and Stanford University to investigate these Home Idle Loads and found the average California home has around 220 watts of continuous electric use (in this use, "continuous" means it appears in every hour of smart meter data). This study included over 100,000 homes in a number of different parts of the state.

HEA was also awarded an EPIC grant to help characterize and log these idling "power hogs" as part of the "Plug Load Database" (PLDB) in EPC-15-025.

The NRDC provided detailed and important comments on this working draft. For example, they wrote: "Some products need to provide their primary service 24/7 and don't have a low-power mode. For example, a security camera needs to record and transmit data 24/7." This statement highlights the issue HEA would like to comment on: the huge set of existing products (plug loads, or MELs) which appear to be excluded from the scope of this LPM testing.

HEA encourages the CEC to include existing "dumb" (non-connected) devices in the analysis of "consumer electronics and appliances in their standby, idle, or in general LPM". There is no current standard for measuring these devices, yet they represent a huge amount of the "MELS" category of residential energy use in existing homes.

Such devices include:

- Continuous hot water recirculation pumps (30-90 watts);
- Heated towel racks (50-140 watts);
- Heated tile bathroom floors set to "Off", but maintaining a minimum temperature;
- Empty or little-used refrigerators;
- Pet water dishes with UV sterilization lamps;
- Heated baby wipe dispensers;
- Digital picture frames;
- Whole-home lighting systems;
- Whole-home audio systems;
- And many others.

For our EPIC project HEA has developed an App with 90 such device categories. These categories are available on request.