

DOCKETED

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Comment Received From: Chris Granda
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ASAP Comments on CEC Low Power Mode Test Procedure Discussion doc

Additional submitted attachment is included below.

Appliance Standards Awareness Project

September 17, 2018

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

Dear Commissioner McAllister,

The Appliance Standards Awareness Project respectfully submits the following comments on the California Energy Commission (CEC) Low Power Mode Test Procedure Discussion Draft, released June 20, 2018 under Docket No. 17-AAER-12.

We strongly support the CEC roadmap process to address the energy consumption of non-federally preempted, electrically powered devices when not operating in primary or active mode. Appliances, lighting and other devices are rapidly integrating with communications networks, promising new functionality and opportunities for energy savings through better control. However, connectivity and enhanced control also have an energy cost. Some devices may end up consuming more energy to stay connected while turned “off”, than they consume while in active use and there is no guarantee of net energy savings.

We agree with CEC that it is appropriate to address low power mode energy consumption through a “horizontal” approach that cuts across many product categories. The number of products that incorporate some kind of low power mode functionality is already large and continues to grow. Although many categories of diverse products now consume energy in a low power mode, low power mode functions tend to be similar, with the emphasis on communications and monitoring. This creates an opportunity to use technical standards to increase energy efficiency across a wide range of product categories.

With regards to the specific items identified in the Low Power Mode Test Procedure Discussion Draft, ASAP supports the detailed comments submitted by the Natural Resources Defense Council, dated September 14, 2018. We appreciate the opportunity to comment on this document.

Sincerely,



Chris Granda
Senior Researcher/Advocate
Appliance Standards Awareness Project (ASAP)