

**DOCKETED**

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<b>Document Title:</b>	Low Power Mode Roadmap Overview and Comments Review
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# Low Power Mode Roadmap

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Webinar



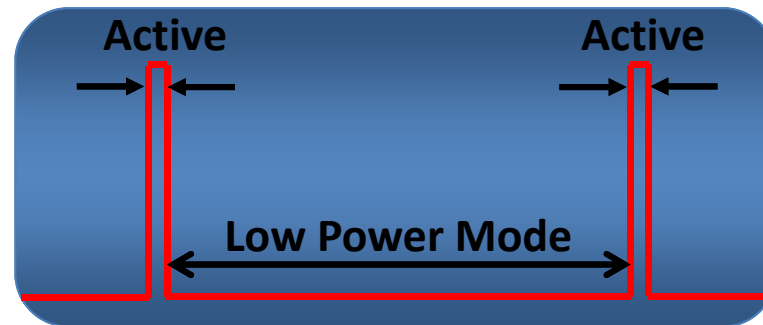
# Agenda

- Low Power Mode roadmap overview
- LPM roadmap versus LPM rulemaking
- Proposed scope
- Comments received for data collection procedure
- Summary and next steps
- Questions and Comments



# Low Power Mode (LPM) roadmap

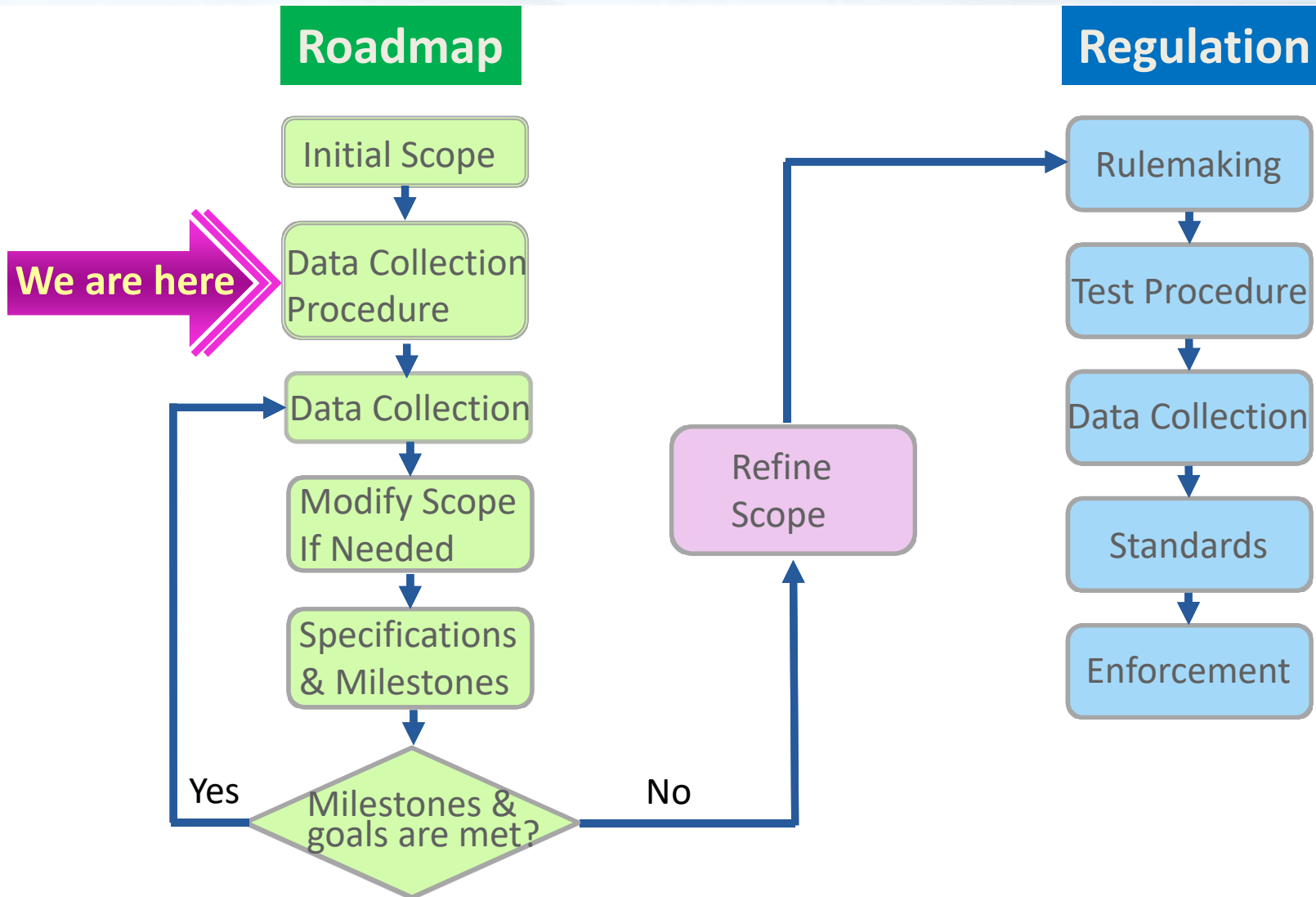
- LPM includes any mode or state other than “Active” mode.



- Active Mode: Device performing its main or primary function/task.
- Roadmap is a new approach to achieve energy savings.



# LPM Roadmap Plan





# Roadmap versus Regulations: Similarities

- LPM energy consumption limit with considerations for:
  - Energy Savings
  - Cost Effectiveness
  - Technical Feasibility
- There is a test procedure.
- Opportunities for public participation through process.
- Outcome is based on data and analysis that demonstrates energy savings.
- Approved by the Energy Commission at a public business meeting.



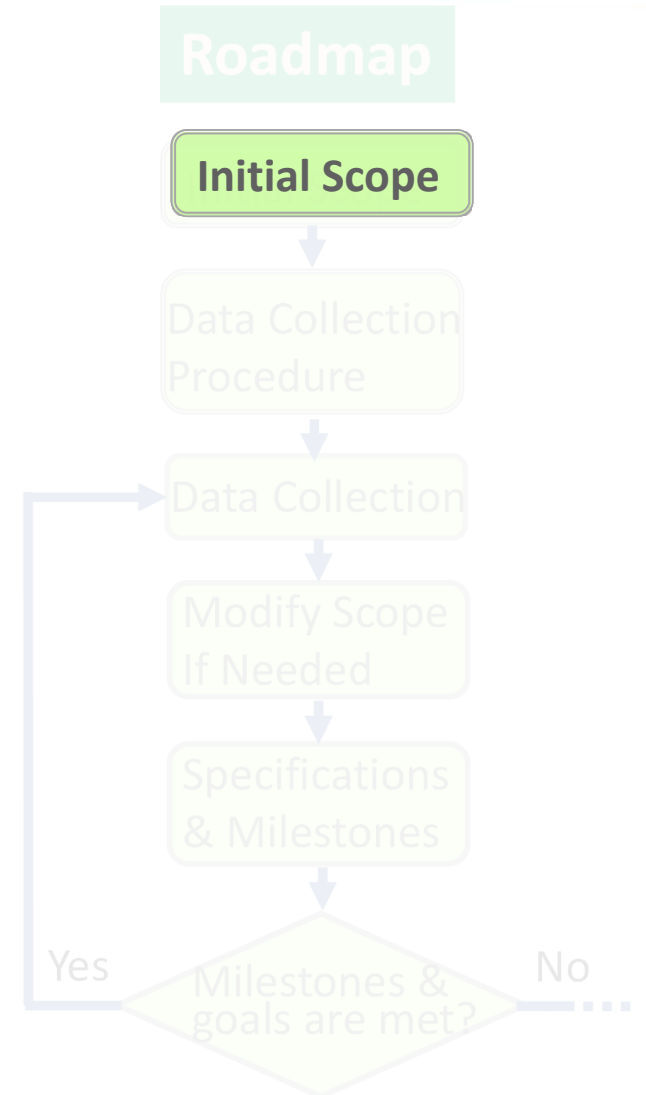
# Roadmap versus Regulations: Differences

- Roadmap specification is voluntary. There is no administrative penalty.
- Roadmaps are not subject to federal preemption.
- Roadmaps can evolve more quickly.
- Roadmaps are more flexible.
- Roadmaps can identify and support non-regulatory activities (e.g., further research questions, funding opportunities, programs) that would support long-term efficiency improvements.



# Initial Scope

- All electric and electronic products **except:**
  - Federally regulated appliances that already have low power mode standards.
  - California state regulated appliances that already have low power mode standards.
  - Appliances that are in other CEC roadmaps.
- Other exemptions may apply.



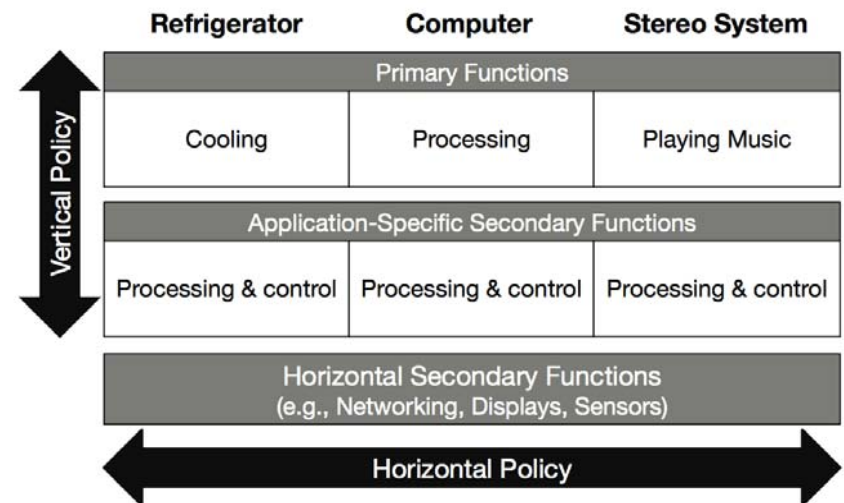




# Energy Proportionality: Horizontal and Vertical Policy

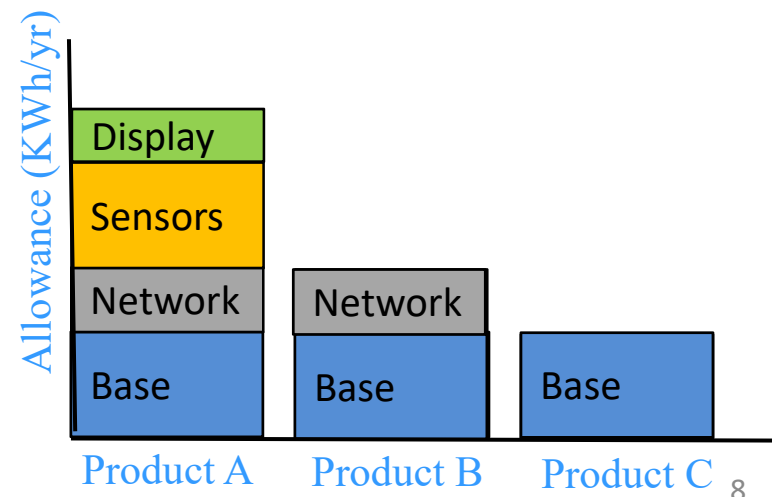
## Horizontal:

- Group Products with similar base functions (secondary functions of the products).
- Establish a baseline energy for the group.



## Vertical:

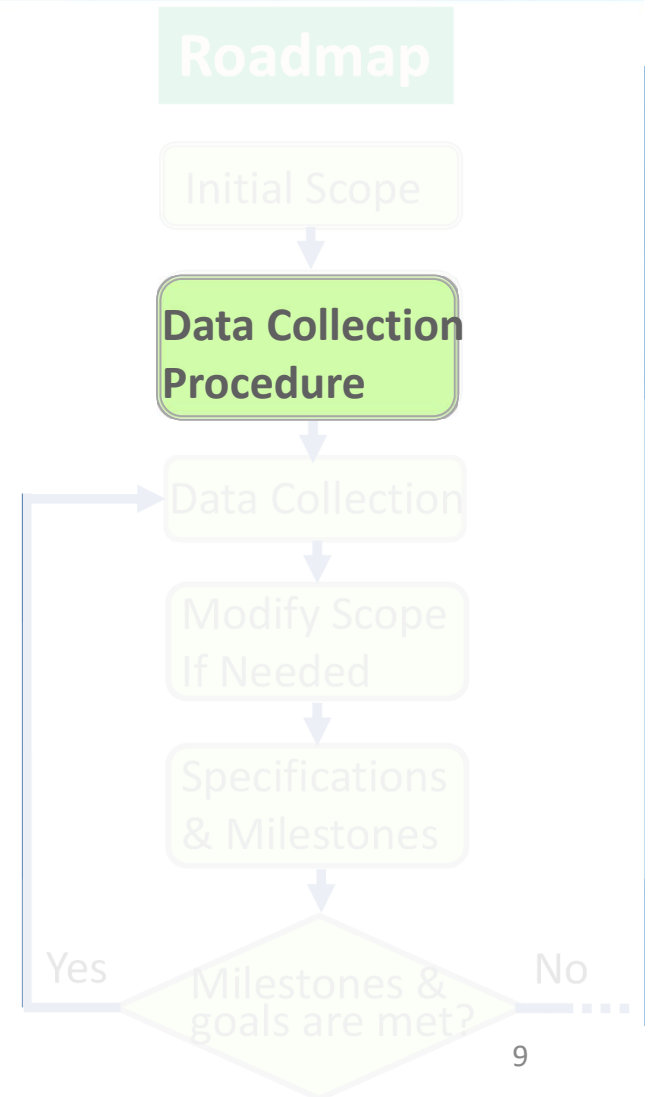
- Apply adders for specific functions other than the base function.





# Data Collection Procedure: Objectives

- Common test procedure for a wide variety of products; break products into groups when absolutely needed.
- Test setups that are repeatable and representative of the real world.
- Measures power draw in an “idle state”—when products are not performing their primary function.
- Capture the power consumption of whatever secondary functions are present.
- Allow stakeholders to collect and submit comparable data.





# Data Collection Procedure: Concept

- Energy Commission staff proposes common test procedure to collect data to characterize LPM power draw for a wide variety of products.
- Products don't necessarily need to have the same function in order to use a common test procedure.
- General approach:
  - Reference to national and international standard procedures and protocols, such as IEC63103, IEC62301, EN50643, Energy Star, etc. and;
  - Modify or add as needed to achieve the objectives (e.g., test setup conditions).



# Data Collection Procedure: Request for Comments

- Energy Commission staff published a discussion document on LPM test procedure on June 20, 2018.
- The discussion document contained a proposed procedure for data collection along with a list of questions.
- Commission staff requested comments from stakeholders and public to fill any gaps in the proposed procedure in order to develop a consensus data collection procedure.
- Stakeholder comments due September 14, 2018.



# Comments: Existing Test Procedures

## Comments:

Product	Test Procedure
Networked edge equipment	EN50643:2018
Networked interconnecting equipment & Small Network Equipment	ETSI EN 303 423
	ANSI/CTA-2049
	EU Broadband Code of Conduct
	EU's Complex Set Top Boxes voluntary agreement
	Energy Star product specification for Small Network Equipment, V1.0
	IEC 62301:2011
Lighting equipment	IEC 63103 (Expected 2020)
Audio-visual (AV) Equipment	IEC 62087
Imaging Equipment	Energy Star product specification for Imaging Equipment, V2.0
Smart Thermostats	Energy Star product specification for Connected Thermostat Products , V1.0
Telephones	Energy Star product specification for Telephony, V3.0

- Commission staff will review these test procedures and refer to them where applicable.
- **Request:** Commission staff appreciates updates from stakeholders on progress and release of IEC 63103 and any other relevant test procedures.



# Comments: Product Provisioning

## “1.1 How should the product be set up for provisioning?”

### Comments:

- Varies by product: perform initial system configuration as applicable.
  - Test twice: Once without any updates, once with full update. Collect update time duration as part of the data collection phase.
- Commission staff clarifies that product provisioning takes place after the product has been set up per data collection procedure and a network connection is established (if required).
  - **Request:** Commission staff requests feedback on specific product types that require more than 24 hours for system provisioning and specific product types that require less than 24 hours for system provisioning.



# Comments: Testing State

## “2.1 Defining the testing state”

### Comments:

- “Disconnecting primary function” should be clarified.
- Rename LPM to be more reflective of its state and be inclusive of products without LPM. Examples: Standby, Long-inactive, Long-no input.
- Define Small Network Equipment (SNE), Edge Devices, Standby, Non-active, No-load, Off-mode, Off-State.

- Commission staff will look into these clarifications.
- **Request:** Commission staff requests feedback on the definition of the above terms.



# Comments: Testing State

“2.2 Process for entering LPM?”

“2.3 Inactivity duration before automatically entering LPM?”

## Comments:

- Proposed process for entering LPM may work.
- LPM state stability needs to be confirmed.
- Time to enter LPM varies by product; Examples: 15 min for printers, 30 min for lighting products, 20 min for most others.

- **Request:** Commission staff seeks data on time to enter LPM state by product type.
- **Request:** Commission staff seeks information on how halting the primary function in different ways can impact LPM power. (For example manually entering sleep vs. allowing the product to auto power down.)





# Comments: Network Connections

## “3.A Traffic content and levels”

### Comments:

- Network traffic should be limited to what is needed to resume the primary function from its non-active mode.
  - ENERGY STAR SNE's 0.5 kbps data rate upstream and downstream is an appropriate approach; ENERGY STAR SNE's 0.5 kbps data rate upstream and downstream cannot be extrapolated to all SNE and edge products.
  - Inbound and outbound traffic requirements will depend on the device type and communication technique.
- **Request:** Commission staff seeks data on the amount of inbound and outbound traffic needed to resume the primary function for different product types and communication technologies.



# Comments: Network Connections

## “3.A Traffic content and levels”

### Comments:

- Security or other similar services will vary based on physical interface/network and the nature of the data service.
  - Look to IEC 63103 and EN 50643:2018 for guidance.
  - Approach from EN 300 328 v2.1.1 (2016-11) is recommended.
- Commission staff will review IEC 63103, EN 50643:2018, and EN 300 328 v2.1.1 (2016-11).
  - **Request:** Commission staff seeks data on the impact of security conditions on power consumption, such as password protection on a local area network (LAN).



# Comments: Network Connections

## “3.B Configuration Requirements: Wires and Wireless connections”

### Comments:

- Ethernet cable’s length has an impact on power use: recommendations from as short as practical to 10 meters.
- No need to test wired connections individually because the difference between the different connections is insignificant.
- WAN or other external network connections should be set up according to EN50643:2018.
- The procedure in 3Bi is from Energy Star and is outdated, instead refer to CTA2049.

- **Request:** Commission staff seeks data on the LPM power sensitivity to cable lengths of 10 m, 2 m, and <2m.
- **Request:** Commission staff seeks data demonstrating the power consumption of devices with wireless versus wired network connections.



# Comments: Network Connections

## “3.B Configuration Requirements: Wires and Wireless connections”

### Comments:

- Data collection procedure needs to address all radio technologies.
- Edge devices do not require different instructions from network devices.
- Additional test conditions should include shield enclosures for wireless devices and external network connections.

- Commission staff agrees testing should be for all radio technologies.
- **Request:** Commission staff seeks feedback to determine whether edge devices can use the same setup instructions as network equipment.
- **Request:** Commission staff seeks data on showing the impact of shield enclosures on power draw and examples of test procedures that have this requirement.



# Comments: Network Connections

## “3.B Configuration Requirements: Wires and Wireless connections”

### Comments:

- Several recommendations for distance between product and wireless router:
  - should not be determined;
  - should be specified by manufacturer;
  - should be specified in the test procedure;
  - depends on router technology and architecture.

- **Request:** Commission staff seeks data on the impact of the distance between product and wireless router on LPM power.



# Comments: Network Connections

## “3.B SNE-Specific Instructions”

### Comments:

- ENERGY STAR SNE TM setup conditions are adequate.
- Use ETSI EN 303 423 for SNE setup conditions.
- Need to include provisions for products with functionality similar to SNE but that are not SNE (e.g. multi-function lighting).
- 3-phase input power requirements should not be added to the setup instructions.

- Commission staff will review IEC 63103 and ETSI EN 303 423 and modify set up instructions as needed.
- Commission staff agrees that 3-phase input power is not necessary.
- **Request:** Commission staff seeks information on what provisions are needed for products with functionality similar to SNE that are not SNE.



# Comments: Sensors

## “4. Additional sensors and environmental conditions to consider”

### Comments:

- The test procedure should allow for new sensor technologies.
- Specify a “clean” wireless network environment (IEC 63103).
- Additional sensors:
  - Hinge/Gyro, presence detection, fluid level, rotational velocity, air velocity, aggregated or instantaneous power levels, air density, static air pressure, dynamic air pressure, contaminants, smoke, carbon monoxide, vibration, door or lid open/close detection
- For Wake on Voice, ambient sound of 50-55dBA as measured at the center of an array microphone.

- **Request:** Commission staff seeks information on new sensor technologies and data on the impact of available sensor technologies on LPM power.
- **Request:** Commission staff also seeks information on the impact of different ambient sound conditions on LPM power.



# Comments: Charging

## “5. & 6. Wired & Wireless Charging”

### Comments:

- The proposed test method could work for some products, but for other products (such as lighting products) following IEC 63103 is recommended.
- Supporting the proposed approach.
- LPM should be measured without a charged product attached. A second test with the fully charged product connected may be conducted, but should not be considered LPM.

- Commission staff will review existing test procedures and modify the proposed setup instructions as necessary.
- **Request:** Commission staff seeks information on the impact of attaching a fully charged product on the power draw.





# Comments: DC Powering

“7. What are appropriate DC input voltages? Other test conditions?”

## Comments:

- Lack of measurement method for products that are generally installed by contractors and not shipped with cabling.
  - Are Power over Ethernet (PoE) products in scope?
- **Request:** Commission staff seeks input for a measurement method for hardwired products where load and controls or other associated loads are on the same circuit.
  - **Request:** Commission staff also seeks LPM data on PoE and other DC-powered products (including data on power draw and market share).



# Comments: DC Powering

“7. What are appropriate DC input voltages? Other test conditions?”

## Comments:

- Provide separate instructions for low- and high-voltage DC.
  - Use manufacturer’s specified input voltage for testing.
  - Measurement instructions need to specify port if multiple USB-PD-Type C ports are present.
- **Request:** Commission staff seeks data on whether powering a product through its different USB-PD-Type C ports will impact its power draw.



# Comments: Systems

## “8. Testing instructions for systems that are powered separately from their system hub?”

### Comments:

- Systems are never in standby; there are always some components within a system that are in non-standby mode to control those that are in standby.
- Conflicting recommendations on how to test systems:
  - For products that receive power and data from a hub, recommend subtracting power of hub from power of hub + product to obtain product power.
    - Should be constrained to 1 product per hub, and the hub/power source must be kept in some sort of identical load in the connected and disconnected state.
  - Products that receive power and data from a hub should not be obtained by subtracting power of hub from power of hub + product.
    - The internal state of the hub product may depend on whether the edge device is connected.

- **Request:** Commission staff seeks data on systems tested using a variety of methods.



# Comments: Off Mode

## “9. Review Proposed Definition and Clarify Instructions for Power Measurement.”

### Comments:

- Describe off mode as a state where everything/all features are off. In certain devices, off mode may only be accomplished by disconnecting from the mains power.
- ENERGY STAR for Imaging Equipment v2.0 definition for off:
  - “The power state that the product enters when it has been manually or automatically switched off but is still plugged in and connected to the mains.”
- Off mode does not include a restorable mode by command, such as network signal.

- Commission staff will review suggestions and make recommendations for off mode definition.
- **Request:** Commission staff seeks data on the impact of the length of time for off mode power measurement.



# Summary

- Roadmaps are non-regulatory based specifications.
- May convert to mandatory data reporting or standards if milestones not met or to prevent backsliding.
- Collaborating with stakeholders to establish a data collection procedure.
- Refer to existing test procedures and only add/modify sections as needed.
- Energy Commission is requesting information for additional questions in this presentation.



# Next Steps

- Establish a data collection procedure.
  - Written comments in response to the additional requested information or any other relevant data or information can be submitted to the docket.
- Collect Preliminary data per data collection procedure.
  - Energy Commission also welcomes additional relevant data collected through more customized test procedures.
- Publish Staff Analysis of Scope and Potential Opportunities.
- Public workshop and comment.
- Revise staff analysis (if needed).
- Public workshop and comment (if needed).
- Energy Commission adoption of LPM roadmap.



# Written Comments

Written comments should be submitted to the Dockets Unit:

**Docket # 17-AAER-12**

<http://www.energy.ca.gov/appliances/2017-AAER-06-13/17-AAER-12.html>

For instructions on how to submit written comments, refer to:

<https://efiling.energy.ca.gov/GetDocument.aspx?tn=226317&DocumentContentId=57082>

Written comments due date will be announced soon.



# Thank You

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# Questions & Comments?

- Type your comment in the chat box which will be read out loud.
- Use the raise hand feature to let us know that you have a question. We will unmute your line to speak.