

DOCKETED

Docket Number:	17-AAER-12
Project Title:	Low-Power Mode & Power Factor
TN #:	227461
Document Title:	ITI Comments for Docket No. 17-AAER-12, Request for Additional Public Comments on Low Power Mode Data Collection Procedure
Description:	N/A
Filer:	System
Organization:	Erica Logan
Submitter Role:	Public
Submission Date:	4/2/2019 6:35:53 AM
Docketed Date:	4/2/2019

Comment Received From: Erica Logan
Submitted On: 4/2/2019
Docket Number: 17-AAER-12

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Additional submitted attachment is included below.



April 2, 2019

Dr. Soheila Pasha
Senior Electrical Engineer
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512

Re: Docket No. 17-AAER-12, Request for Additional Public Comments on Low Power Mode Data Collection Procedure

Dear Dr. Pasha,

The Information Technology Industry Council (ITI) appreciates the opportunity to provide further comments in response to the California Energy Commission's (CEC) request for additional public comment for a low power mode (LPM) data collection procedure.

Industry remains committed to the fundamental tenets of energy efficiency policy and we continue to support internationally recognized standards and best practices, such as ENERGY STAR® and IEC 62301:2011.

As described at greater length in ITI comments submitted in response to CEC's September 14, 2018 Docket No. 17-AAER-12 request for public comment, horizontal test procedures are fundamentally flawed. Further, there are inherent technical problems with both horizontal and vertical approaches.

Horizontal Approaches

First, not all devices can even be placed into a LPM; small network equipment (SNE), for example, scales power use with workload. Further, several energy efficiency standards define 'on' and 'idle' states for each device. Manufacturers build their products in alignment with these product specific definitions. There is no single universal definition for LPM across all products and adding LPM as a new state before "off" state does not make sense.

Vertical Approaches

Each base product is likely to have unique low power characteristics that make setting a unified standard problematic at best and heavily biased at worst. In contrast, a product specific vertical approach will identify the unique considerations of each vertically integrated system, including separate capabilities and limits of each of the product components such as sensors, wifi/broadband transmitter/receiver and controller, while also accounting for effects of the given product on the network.

In summary, industry continues to recommend a focus on individual products. With respect to the 21 specific questions posed in CEC's request for additional public comment, we urge the CEC to evaluate existing findings of publicly available ENERGY STAR product data. From defining testing

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states to accounting for power consumption of devices with wireless versus wired network connections, the ENERGY STAR test parameters are very different by product.

Any deviations to existing well established test procedures would necessitate additional product re-testing and evaluation, an unnecessary expenditure of time and expense for manufacturers and governments.

We welcome the opportunity for further dialogue with the CEC and would be pleased to discuss any element of interest from this document in greater detail.

Sincerely,



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