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## **ITI comments on CEC's proposed rulemaking Docket 20-AAER-03**

Information Technology Industry Council (ITI) comments on CEC's proposed amendment to computers and computer monitors appliance efficiency regulations to incorporate new technologies and innovation (Docket 20-AAER-03)

*Additional submitted attachment is included below.*

November 13, 2020

Commissioner J. Andrew McAllister  
California Energy Commission (CEC)  
<https://www.energy.ca.gov/rules-and-regulations/appliance-efficiencyregulations-title-20/appliance-efficiency-proceedings-4>

Subject: ITI comments on CEC's proposed rulemaking to amend computers and computer monitors appliance efficiency regulations to incorporate new technologies and innovation (Docket 20-AAER-03)

Dear Honorable Commissioner J. Andrew McAllister:

The Information Technology Industry Council (ITI) is pleased to work again with CEC on its proposed rulemaking to modify computers and computer monitors appliance efficiency regulations to incorporate new technologies and innovations.

ITI represents 70 of the world's leading information and communications technology (ICT) companies from all corners of the technology sector, including hardware, software, digital services, semiconductor, network equipment, and internet, as well as "technology-enabled" companies that rely on ICT to transform their businesses. Promoting innovation worldwide, we engage with governments and associations around the globe to share information and work collaboratively to develop effective policy approaches that enhance cybersecurity, protect privacy, and enable businesses to thrive in an ever-changing and dynamic global market.

ITI members strongly believe that California energy efficiency standards need to keep pace with new technologies and innovations to provide California consumers more innovative solutions and energy efficient choices. CEC's proposed rulemaking is a step in the right direction. Accordingly, ITI supports all of the key amendments in CEC's proposed rulemaking to amend computers and computer monitors appliance efficiency regulations to incorporate new technologies and innovation (Docket 20-AAER-03). ITI also supports the regulatory language detailed in Express Terms. Below is a brief description of the key changes CEC is proposing:

- 1) A new energy allowance or 'adder' for computer monitors with refresh rates of 300 Hz or higher;
- 2) A new energy allowance or 'adder' for Gb LAN Ethernet integrated onto the motherboard with data transfer rates of more than 1 Gb/sec and less than 10 Gb/sec;
- 3) Incorporating a new definition for multi-screen notebook computers, and modifying the current notebook computer to include multi-screens, modifying test procedures, and adder for each integrated display

- 4) Modifying the computers regulation to incorporate a definition for notebook computers with cyclical behavior, and including modified test procedures for measuring short-idle mode, long-idle mode, sleep mode and off mode testing for such computers.

The only minor change we would propose to the draft rulemaking is with regard to Table X, which pertains to computers with cyclical behavior. We would like to request that, when running the full charging cycle test for various power modes, Table X not require reporting test time duration in seconds. Since some of the modal testing time could exceed 24 hours, it would be better to report test duration in one of the following two formats: 1) Hrs:Mins 2) Hours and minutes expressed in a decimal number as XX.XX hours. Reporting a vast number of seconds is not practical (for example for a 26-hour test, the current draft would require reporting the number as 93,600 secs).

In addition ITI would appreciate if CEC could clarify when the amendments will become effective after the proposed rulemaking is adopted. Specifically, ITI recommends that all of changes pertaining to the computers and computer monitors regulation should apply starting on January 1, 2021.

ITI would like to take this opportunity to thank Commissioner McAllister and CEC staff for years of collaboration on appliance energy efficiency standards. ITI fully supports CEC's proposed rulemaking process to incorporate new computers and computer monitors technology innovations. Please do not hesitate to reach out to us with any questions. We look forward to working with CEC during the rulemaking process.

Best regards,



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