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NRDC and ASAP comments on proposed Data Collection Procedure

Please accept these comments on behalf of NRDC and ASAP.

Thank you,

Brian Fadie
State Policy Associate
Appliance Standards Awareness Project (ASAP)

Additional submitted attachment is included below.

**Appliance Standards Awareness Project
Natural Resources Defense Council**

October 8, 2021

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

Dear Commissioner McAllister,

Thank you for the opportunity to comment on the proposed Data Collection Procedure (DCP) for the California Energy Commission's (CEC) Low Power Mode (LPM) Roadmap.

The Natural Resources Defense Council is an international nonprofit environmental organization with more than 1.3 million members and online activists, advocating for equitable building decarbonization and clean air policies to mitigate the climate crisis.

ASAP is a coalition that includes representatives of efficiency, consumer and environmental groups, utility companies, state government agencies, and others. Working together, the ASAP coalition seeks to advance cost-effective efficiency standards at the national and state levels through technical and policy advocacy and through outreach and education.

We strongly support the CEC LPM roadmap process to address the energy consumption of non-federally preempted, electrically powered devices when not operating in primary or active mode. Idle energy use (also known as "vampire" energy use) is one of the largest and fastest growing energy uses in buildings, and there is significant opportunity to reduce this energy use cost-effectively.¹ While the idle energy use of individual products is relatively small in most cases, in aggregate it is one of the largest uses of energy in homes. An NRDC investigation into idle load electricity consumption found that on average it represented nearly 23 percent of household electricity consumption in northern California homes.²

The number and diversity of products incorporating LPM functionality is already large and continues to grow. However, while products consuming energy in one or more LPM fall into diverse categories, the features being offered in LPM tend to be similar, including sensors, displays, and network connections. This creates an opportunity to increase energy efficiency across many products at once by using a cross-product, horizontal approach. ASAP and NRDC strongly support the proposed DCP for its movement down a horizontal approach path.

¹ "Home Idle Load: Devices Wasting Huge Amounts of Electricity When Not in Active Use." NRDC, 2015.
<https://www.nrdc.org/sites/default/files/home-idle-load-IP.pdf>

² Ibid.

Additionally, we support the proposed DCP because it would enable crucial data collection across a wide range of products, creating valuable information that can inform future analysis and decisions, including the scope of products and efficiency targets. ASAP and NRDC have previously encouraged CEC in this docket to keep the scope of the LPM roadmap as broad as possible and only narrow it down as needed after detailed analysis.³ The proposed DCP would help generate data that would aid this future analysis and decision making.

We appreciate the opportunity to comment.

Respectfully submitted,

Pierre Delforge
Senior Scientist, Building Decarbonization
Natural Resources Defense Council

Brian Fadie
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³ [Docket 17-AAER-12, NRDC/ASAP comments filed 9/18/17.](#)