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CEA Comments on Low Power Mode Roadmap and Proposed Data Collection Procedure

Additional submitted attachment is included below.

California Energy Alliance

October 11, 2021

California Energy Commission
Docket #17-AAER-12
1516 Ninth Street, MS-4
Sacramento, CA 95814-5512

Re: Docket 17-AAER-12 – CEA Comments on the Data Collection Procedure for the Low Power Mode Roadmap

Dear Commissioner McAllister and Staff,

Thank you for the opportunity to provide comments on the California Energy Commission (Energy Commission) Low Power Mode (LPM) Roadmap Plan and proposed Data Collection Procedure (DCP) as prepared by the California Investor Owned Utilities Statewide Codes and Standards Enhancement (CASE) Team. The California Energy Alliance (CEA) is a leading advocacy organization for California's energy stakeholders. Founded in 2016, CEA is a nonprofit, non-partisan alliance of business, government, academia, and NGO leaders advocating for energy productivity to achieve economic growth, environmental justice, energy security, affordability, and resilience. Our work focuses on research, advocacy, outreach, and evolution of codes, standards, and policy.

CEA supports the Energy Commission's LPM Roadmap Plan and the CASE Team's proposed DCP as plug loads are a significant and growing category of energy use in residential and commercial buildings. Plug and process loads in commercial buildings are projected to increase from 40 percent in 2017 to 49 percent by 2040, according to a 2019 NREL study.[1] Additionally, a 2015 study by NRDC "found that idle load electricity represents on average nearly 23 percent of household electricity consumption in northern California homes."[2] The horizontal approach, presented by the Energy Commission and CASE Team, for assessing products across categories in an "Inactive

[1] NREL 2019, Integrating Smart Plug and Process Load Controls into Energy Management and Information Systems Platforms https://www.nrel.gov/docs/fy19osti/74080.pdf

[2] "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

State" delivers an effective pathway to capture energy savings potential from these unregulated electric loads in buildings.

CEA's current work on an Electric Program Investment Charge (EPIC) project focused on evaluating plug load devices to determine savings potential and inclusion in future energy codes and standards overlaps well with the LPM Roadmap and DCP. CEA's project, known as Plug Load Energy Testing to Inform Codes and Standards (PLETICS), will evaluate the energy consumption of multiple plug load device types in various operating modes and configurations; and quantify statewide market size and energy use in order to determine potential savings associated with their inclusion in futures energy codes and standards. Device types will be 1) Laboratory Equipment, 2) Commercial Office Equipment, and 3) Residential Networking Equipment. There is a collaborative opportunity to share data and further develop LPM test metrics with the CASE Team as it relates to the device categories in this PLETICS project.

CEA thanks the Energy Commission for the opportunity to submit these comments, and we look forward to working with you and the CASE Team on the LPM Roadmap and DCP as we continue to work on our PLETICS project.

Sincerely,

Josh Dean
Executive Director
California Energy Alliance

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