

DOCKETED

Docket Number:	14-AAER-02
Project Title:	Computer, Computer Monitors, and Electronic Displays
TN #:	204765
Document Title:	American Council for an Energy-Efficient Economy Comments on Appliance Efficiency Pre-Rulemaking
Description:	For computers, computer monitors, and signage displays
Filer:	System
Organization:	American Council for an Energy-Efficient Economy/Jennifer Amann
Submitter Role:	Public
Submission Date:	5/29/2015 11:04:28 AM
Docketed Date:	5/29/2015

Comment Received From: Jennifer Amann

Submitted On: 5/29/2015

Docket Number: 14-AAER-02

Comments on Appliance Efficiency Pre-Rulemaking for computers, computer monitors, and signage displays, Docket No. 14-AAER-2

Additional submitted attachment is included below.

May 29, 2015

Mr. Harinder Singh
California Energy Commission
Dockets Office, MS-4
Re: Docket No. 14-AAER-2
1516 Ninth Street
Sacramento, CA 95814-5512

Dear Mr. Singh,

The American Council for an Energy-Efficient Economy (ACEEE), a nonprofit, 501(c)(3) organization, acts as a catalyst to advance energy efficiency policies, programs, technologies, investments, and behaviors. ACEEE has been leading efforts to develop, promote, and negotiate appliance and equipment standards at the federal and state levels for several decades. On behalf of ACEEE, I respectfully submit our comments on the Appliance Efficiency Pre-Rulemaking for computers, computer monitors, and signage displays, Docket No. 14-AAER-2.

Introduction

ACEEE supports the California Energy Commission's (CEC) efforts to develop computer and display standards, and we recognize the Commission's successful track record establishing and implementing standards for other electronic products such as televisions and power supplies. In such products, a wide difference exists in energy consumption for comparable performance between the average and the best-in-class models. Standards are an effective means of closing this gap and realizing the significant opportunity to save energy and reduce greenhouse gas emissions. Since the US Department of Energy's standards rulemaking for computer systems is still in the early stages, the CEC process is timely and could go a long way in shaping national standards and achieving even larger benefits.

Overall, the standards proposed by the CEC are technically feasible and cost-effective. We believe there is an opportunity for setting even more stringent standards for each of the product categories. As data presented by the Natural Resources Defense Council (NRDC) and the California Investor Owned Utilities (IOUs) during the public workshop shows, actual energy use for these products is higher than that estimated by the CEC staff when adjusted to account for the way computers are actually used in the field. Revising these estimates may reveal a significantly higher energy savings opportunity and provide an economic justification for deeper savings.

Computer Standards

The computer industry has made rapid progress in improving product energy efficiency even while adding more advanced features in the last few years. Considering the current trajectory of efficiency improvement, the CEC proposed limits seem generous for an effective date three years from now. Since the standards do not cover active mode energy use, it is critical to maximize low power efficiency in order to significantly affect total energy consumption and we recommend that CEC consider setting more stringent limits. As demonstrated in the public workshop by Aggios, the proposed limits can be met already by products in the market through optimizing power management and using more efficient power supplies.

We support the CEC proposal to cover both desktop and notebook computers. However, we suggest CEC should reassess if integrated desktops require a separate limit from conventional desktops. Integrated desktops have a smaller form factor, leading to thermal constraints that require more efficient components and are, as a result, generally more energy efficient than conventional desktops. Setting levels that are appropriate for conventional desktops would give all integrated desktops an unwarranted allowance, allowing all of them, even those with inefficient designs, to comply.

We believe that the CEC proposed limits for notebooks need to be significantly more aggressive to achieve any meaningful energy savings. NRDC's workshop presentation showed that two mainstream notebook computers easily meet CEC's

proposed limit today with out-of-the-box settings. There is room for stringency in both the base allowance and the display adder. As notebooks are a fast growing category, it is important to set a strong standard that guides efficient innovation.

Monitors and Display Standards

ACEEE supports the CEC in their efforts to set standards for computer monitors and signage displays. We believe there is the potential to set more stringent standards for both these product categories and we endorse and support the technological recommendations made by the Appliance Standards Awareness Project (ASAP) in their comments.

Overall, we applaud the Commission for continuing to lead the state and the nation towards more energy efficient products and systems. We are grateful for the opportunity to provide comments and look forward to working with CEC and other stakeholders on this important rulemaking. Please contact me if you have any questions or require any further information.

Sincerely,

A handwritten signature in blue ink, appearing to read "Jennifer Amann".

Jennifer Amann
Buildings Program Director