

## DOCKETED

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**NVIDIA comments to CEC (14-AAER-02)**

*Additional submitted attachment is included below.*

## **NVIDIA comments to the CEC on the staff report for Docket: 14-AAER-02**

Project Title: Computer, Computer Monitors, and Electronic Displays

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### **NVIDIA is a leader in performance per Watt**

NVIDIA GPUs are in High Performance Computers (HPCs) and supercomputers, some of the most advanced computing technologies in the world. We naturally and competitively seek opportunities to improve the performance per Watt of our GPUs, and our record indicates that we have established ourselves as a leader on that metric. We support the efforts of the California Energy Commission (CEC) to find constructive ways for users of computer technology to save energy and we share the goal of improving the energy performance of computer technologies.

### **Caution for unintended consequences of regulation**

The California Energy Commission's proposed regulation for computers, computer monitors, and displays may have the unintended consequence of limiting innovation in the high-performance computer (HPC) industry in California. Supercomputers and HPCs enable innovation in multiple industries across the state (examples include medical imaging, automotive driver assistance, and filmmaking). If the regulation of energy consumption in idle state for supercomputers and HPCs is too restrictive, it may threaten those technologies' ability to function as desired, thus negatively affect the growth of these key industries.

### **Closing comments and recommendations**

We encourage the CEC to consider the potential unintended impacts of this regulation on supercomputers and HPCs and to take steps as necessary to protect innovation in this industry and the critical functionality of these technologies. The GPU is an evolving technology, and the regulation should be mindful of the correlation between advanced performance and energy consumption. We recommend the CEC consider an exemption for high-end applications such as supercomputers and HPCs, which have specific functional requirements and represent a relatively small number of computers in the market. We will continue to work with the CEC directly and contribute to the dialogue between the CEC and industry associations to provide specific technical background information in support of these recommendations.