

| <b>DOCKETED</b>         |   |
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| <b>Project Title:</b>   | Low-Power Mode  |
| <b>TN #:</b>            | 260097  |
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| <b>Submitter Role:</b>  | Other Interested Person   |
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*Comment Received From: AGGIOS, Inc.  
Submitted On: 11/15/2024  
Docket Number: 17-AAER-12*

**AGGIOS Inc Feedback on Proposed DCP for LPM Roadmap**

*Additional submitted attachment is included below.*



**Commissioner Andrew McAllister  
California Energy Commission  
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Sacramento, CA 95814-5512**

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Irvine, 11/15/2024

**Subject: Data Collection Procedure (DCP) for the California Energy Commission's (CEC) Low Power Mode (LPM) Roadmap proposed by IoUs (17-AAER-12)**

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.

I am referencing our previous written comments on the subject matter from 9/14/2018 and 10/12/2021 for the information on AGGIOS as well as our continuous activities on both micro- and macro-energy efficiency, including the technical support of the proceedings of the California Appliance Efficiency Regulation for Computers (California Code of Regulations, Title 20, sections 1601-1609).

Notwithstanding our strong support for CEC's energy efficiency activities on appliances, we are here repeatedly expressing major concerns about the proposed DCP for the LPM roadmap.

The LPM DCP proposal is based on a technically wrong assumption that the EnergyStar test procedure for computers defined some 20+ years ago can be applied to assess the power consumption of today's residential appliances. At that time, the power measurements of computers in the idle state were used merely as proxy for the power consumption of the active state of the computer, as at that time computers used only 15% more power when active than when idle. As such, it was deemed sufficiently accurate for the purpose at that time and the state of technology.

Even on 4/20/2017 when the 17-AAER-12 docket was opened (7 years ago), the "vampire" energy consumption of appliances could not be properly tested with the proposed DCP procedure. Today, in the age of extensive function integration (e.g. routers), 24/7 operation (e.g. Alexa) and unavoidable Artificial

Intelligence (AI), the proposed DCP is inadequate. As we could see from the comments by the industry so far, the initial goal of having a simple unified testing procedure is unattainable and is quickly moving to a maze of adders, groupings and other forms of exceptions which are hard to understand, manage and asses the overall benefits for energy conservation.

For the above technical reasons and due to the upcoming challenges in front of California to protect its environmental standards, I am suggesting to postpone the 17-AAER-12 activity until the matter is reviewed in the community of technical experts and from the perspective of the unavoidable massive impact of AI on the energy consumption of current and future appliances.

Sincerely,

A handwritten signature in black ink, appearing to read 'Vojin Zivojnovic', with a long horizontal flourish extending to the right.

**Vojin Zivojnovic, Ph.D.**

**CEO**

**AGGIOS, Inc.**

**Irvine, CA**