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Low-Power Mode DCP RFI Response

This letter comprises the comments of the Pacific Gas and Electric Company (PG&E), San Diego Gas and Electric (SDG&E), and Southern California Edison (SCE), collectively referred to herein as the California Investor-Owned Utilities (CA IOUs), in response to the California Energy Commission (CEC) Request for Information (RFI) and Feedback on Proposed Data Collection Procedure (DCP) for Low-Power Mode (LPM) Roadmap.

Additional submitted attachment is included below.



November 18, 2024

Ho Hwang
California Energy Commission
715 P Street
Sacramento, CA 95814

Topic: Request for Information for Establishing Data Collection Procedure for the Low-Power Mode Roadmap

Docket Number: 17-AAER-12
TN Number: 259429

Dear Commission Staff:

This letter comprises the comments of the Pacific Gas and Electric Company (PG&E), San Diego Gas and Electric (SDG&E), and Southern California Edison (SCE), collectively referred to herein as the California Investor-Owned Utilities (CA IOUs), in response to the California Energy Commission (CEC) Request for Information (RFI) and Feedback on Proposed Data Collection Procedure (DCP) for Low-Power Mode (LPM) Roadmap.

The CA IOUs comprise some of the largest utility companies in the nation, serving over 32 million customers in the Western U.S. We are committed to helping customers reduce energy costs and consumption, while striving to meet their evolving needs and expectations. Therefore, we advocate for standards that accurately reflect the climate and conditions of our respective service areas.

The CA IOUs applaud the CEC for developing an innovative roadmap process to reduce the energy consumption of products when they are not providing their primary function(s). In response to the CEC's objectives to establish a DCP for LPM, the CA IOUs developed a proposal that yields reproducible measurements for the scope outlined in Appendix A of the RFI.^{1,2} The proposal meets the CEC's goals, outlined in their January 2019 webinar:

- **Create a standard test procedure** for a diverse range of products.
- **Break products into groups** with separate setup or measurement instructions only when necessary.

¹ California Investor-Owned Utilities, "Proposal: Data Collection Procedure for Inactive Condition Power, Version 3," *California Energy Commission*, February 3, 2023, <https://efiling.energy.ca.gov/GetDocument.aspx?tn=248671&DocumentContentId=83170>.

² California Energy Commission, "Request for Information (RFI) and Feedback on Proposed Data Collection Procedure for Low-Power Mode Roadmap," *California Energy Commission*, October 2, 2024, <https://efiling.energy.ca.gov/GetDocument.aspx?tn=259429&DocumentContentId=95514>.

- **Define reproducible test setups** that represent real-world usage.
- **Measure power draw** in an “inactive” condition where the product is not performing a primary function.
- **Capture power draw** of supporting functions in the inactive condition.
- **Allow stakeholders to collect and submit comparable data.**³

We recommend that the CEC finalize and adopt this procedure after incorporating stakeholder input for the upcoming Initial Data Collection phase and the subsequent Data Reporting phase(s).

We respectfully submit the following comments to the CEC in response to RFI questions #8 and #12:

8. What is your feedback on CEC’s intent to utilize the MAEDbS platform for the initial data collection?

The CA IOUs recommend that the CEC accept data from non-manufacturer stakeholders submitted outside the Modernized Appliance Efficiency Database System (MAEDbS) during the Initial Data Collection phase. We support the CEC’s proposal to use the MAEDbS platform to collect functionality and performance data from manufacturers during this phase and afterward. However, we emphasize that non-manufacturer stakeholders cannot use MAEDbS to submit product test data. Therefore, we urge the CEC to accept data from non-manufacturer stakeholders through the Data Reporting Template (DRT) during the Initial Data Collection phase (Figure 1).⁴ Allowing these stakeholders to submit data may enhance the information available to CEC to identify energy-savings opportunities and develop the Roadmap’s scope and performance targets. Once the Roadmap transitions to the Data Reporting phase, MAEDbS will be the appropriate platform for all data reporting.

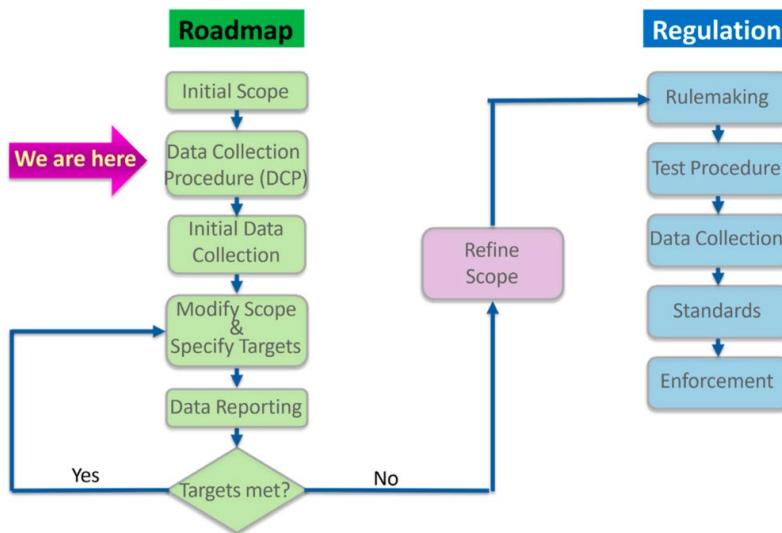


Figure 1: LPM Roadmap process diagram
Source: CEC

³ California Energy Commission, “Low Power Mode Roadmap,” *California Energy Commission*, January 25, 2019, <https://efiling.energy.ca.gov/GetDocument.aspx?tn=226376&DocumentContentId=57150>.

⁴ California Investor-Owned Utilities, “California Investor-Owned Utilities Comments - Low Power Modes Data Reporting Tool,” *California Energy Commission*, May 14, 2021, <https://efiling.energy.ca.gov/GetDocument.aspx?tn=237815&DocumentContentId=71056>.

12. What is your feedback on this method of grouping and categorization, especially regarding what information is collected during the initial data collection?

The CA IOUs continue to support the CEC's proposed clustered horizontal adder approach for product grouping and target setting. This approach allows the CEC to realize the benefits of horizontal standardization while also setting tailored targets that recognize differences in functionality. The clustered horizontal adder approach can save energy without impeding product development and innovation.

The CA IOUs appreciate the opportunity to provide these comments on the RFI concerning the DCP for the LPM Roadmap. We thank the CEC for its consideration and look forward to the next steps in the process.

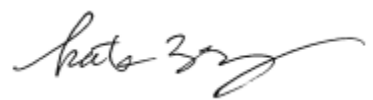
Sincerely,



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