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Comments on Low-Power Mode DCP RFI

Additional submitted attachment is included below.

Appliance Standards Awareness Project

November 18, 2024

Ho Hwang
California Energy Commission
Docket Unit
715 P Street, MS-4
Sacramento, CA 95814

RE: Docket No. 17-AAER-12: Low-Power Mode Roadmap

Dear Commission Staff:

This letter constitutes the comments of the Appliance Standards Awareness Project (ASAP) on the request for information (RFI) and feedback on the proposed Data Collection Procedure (DCP) for the Low-Power Mode (LPM) Roadmap. We appreciate the opportunity to provide input to the Energy Commission.

We continue to support the LPM roadmap. The roadmap recognizes the large number of products that consume power in low power modes; while this energy consumption may be relatively small for an individual product category, collectively there is a large opportunity to achieve energy savings by reducing LPM energy consumption. We encourage the Energy Commission to continue to work to advance the roadmap.

We believe the scope of products outlined in Appendix A is appropriate as a starting point. We understand that the products listed in Appendix A reflect those for which the CASE Team concluded that the proposed DCP would produce reproducible results. We therefore believe that the scope of products in Appendix A is a reasonable starting point for the initial data collection using the DCP. However, the CASE Team has noted that they plan to continue to refine the DCP so that it yields reproducible results for more products.¹ We therefore encourage the Energy Commission to consider expanding the scope in the future to cover additional products.

We believe the proposed DCP is appropriate for the initial data collection. The RFI notes that the proposed DCP builds on the IEC test procedure for low-power modes (IEC 62301:2011) but provides additional setup instructions and clarity around the inactive condition power measurements. These additional instructions will help ensure that all test labs are carrying out the LPM measurements in a consistent manner. The RFI further notes that the proposed DCP has gone through three iterations, including extensive round robin testing. We therefore believe that the proposed DCP is ready to be used for the initial data collection as part of the LPM roadmap.

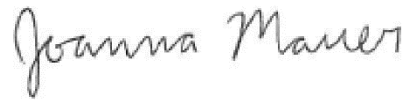
We believe the proposed clustered horizontal approach is appropriate. The RFI explains that the proposed clustered horizontal approach would group products with similar baseline idle power consumption; this approach would also provide allowances related to specific secondary functions in developing power consumption criteria. Given the large number of product categories, we believe that such a clustered approach would help simplify the LPM roadmap while accounting for additional

¹ <https://efiling.energy.ca.gov/GetDocument.aspx?tn=248671&DocumentContentId=83170>. p. 3.

features that may have associated idle power consumption. The initial data collection effort will also help inform the most appropriate way to structure the horizontal clustered approach.

Thank you for considering these comments.

Sincerely,

A handwritten signature in black ink that reads "Joanna Mauer". The signature is written in a cursive, flowing style.

Joanna Mauer
Deputy Director