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Consumer Technology Association's Comments on Low Power Mode DCP RFI

Additional submitted attachment is included below.

BEFORE THE
CALIFORNIA ENERGY COMMISSION

In the matter of: Phase 2 Appliance Efficiency Regulations & Roadmaps	Docket No. 17-AAER-12 Low-Power Mode

COMMENTS OF THE CONSUMER TECHHNOLOGY ASSOCIATION

The Consumer Technology Association® ("CTA")[1] respectfully submits these comments[2] regarding the proposed implementation of a data collection procedure (DCP) using the plan offered by the investor-owned utility Statewide Codes and Standards Enhancement (CASE) team.

General Comments on the DCP

To safeguard the integrity and quality of the DCP, the Commission should require all persons submitting results to document their credentials and identity, and describe their test facilities and qualifications, including the make, model, serial number and last calibration date of test equipment (and require that such calibration be within one year of test date). Without that information, the Commission cannot reasonably judge the veracity of the results and it cannot itself, or enable third parties such as the manufacturer, to ask questions. Anonymous results should not be accepted under any circumstances, and when receiving information from third parties the Commission should examine critically the credibility of the provider and its testing qualifications.

Even with such proper attribution, third-party results could be inaccurate, and in some cases the Commission may receive conflicting information. Data from third parties should therefore not be reported through and posted on MAEDbS where it could be perceived as carrying the presumption of validity. CEC should notify the brand owner of such devices of the results of receipts and provide an opportunity for review and correction. Ideally the information would not be made public until such review is complete, but if the information is made public then it should be clearly marked as unverified information that should not be relied upon for any purpose other than as a basis for further testing and study.

The Commission sought comments on the use of "a clustered horizontal approach to device categorization, meaning that products with similar baseline idle power consumption are

[1] CTA is North America's largest technology trade association that owns and produces CES®, the world's most influential tech event. CTA's members are the world's leading innovators, from startups to global brands, including many manufacturers of SNE.

[2] CTA has co-signed separate comments that address the DCP for small network equipment.

grouped and made eligible for allowances related to specific secondary functions such as displays, sensors, and network connectivity." In some cases it could be inappropriate to standardize functional allowances because power requirements for different categories of devices may vary based on differences in how consumers use such devices or in how and why the devices perform such functions. Such determinations should only be made at a later stage of this proceeding once the Commission knows exactly which types of devices it is proposing to regulate.

Specific Comments Regarding Imaging Equipment

The Commission should use EPA's ENERGY STAR database[3] as the foundation for any analysis of imaging equipment rather than starting from scratch with the CASE DCP V3 test method. With test results and information on 2,664 imaging devices, the EPA's data set is more reliable and comprehensive than could be collected by the DCP.

To make effective use of the EPA database, the Commission needs to use the EPA's widely used EPA test method tailored to imaging devices instead of the CASE team proposed DCP V3 test method. The DCP V3 test method has differences such as a different setup and a requirement to collect warm-up data, which could produce at least slightly different results that would distort effective comparisons and analysis if the Commission were to evaluate data collected using two different test methods. Moreover, these differences are unnecessary and suboptimal for imaging devices. The DCP V3 method was designed to cover a wide variety of devices, while the EPA method is well tailored to specific characteristics of imaging equipment. It would impose significant costs and burdens on manufacturers to retest their entire fleet of devices. Many companies already have tested their imaging equipment using the ENERGY STAR test method. Since the new testing would not provide any benefits, it would be wasteful to require duplicative testing, and it is likely that fewer companies would participate.

The Commission should also clarify that the DCP is not seeking data on imaging devices intended to be used primarily by printing professionals or in office environments, which are similarly excluded from ENERGY STAR.[4] The inclusion of such devices in the results could make it more difficult for all parties to discern useful information from the results to advance the core purpose of this docket to address residential energy usage.

If imaging equipment were to remain in-scope during the later target specification stage of this proceeding, CTA could engage further with the Commission and CASE team to demonstrate why the EPA test method should be used instead of the CASE test method. In the meantime, because the EPA database provides the best starting point for a DCP, the Commission

[3] U.S. Environmental Protection Agency, ENERGY STAR Certified Imaging Equipment, available at https://www.energystar.gov/productfinder/product/certified-imaging-equipment/results (viewed November 18, 2024).

[4] ENERGY STAR excludes Professional Imaging Products, Multifunction Devices/Printers with a speed of 30 ppm or higher, and equipment sold by imaging device manufacturers for office use. See ENERGY STAR® Program Requirements Product Specification for Imaging Equipment: Test Method for Determining Imaging Equipment Energy Use Rev. Dec-2018.

should direct DCP participants to use the ENERGY STAR test method for the reasons set forth in these comments.

Respectfully submitted,

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