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**17-AAER-12 Request For Information (RFI) and Feedback on
Proposed Data Collection Procedure for Low-Power Mode
Roadmap**

Additional submitted attachment is included below.

November 18, 2024

California Energy Commission

715 P Street, MS-4

Sacramento, CA 95814

Re: Request For Information (RFI) and Feedback on Proposed Data Collection Procedure for Low-Power Mode Roadmap

Dear California Energy Commission:

The Information Technology Industry Council (ITI), on behalf of our members, is pleased to submit the following comments in response to the Request For Information (RFI) and Feedback on the Proposed Data Collection Procedure for Low-Power Mode Roadmap.

The Information Technology Industry Council (ITI) is the premier global advocate for technology, representing the world's most innovative companies. Founded in 1916, ITI is an international trade association with a team of professionals on four continents. We promote public policies and industry standards that advance competition and innovation worldwide. Our diverse membership and expert staff provide policymakers the broadest perspective and thought leadership from technology, hardware, software, services, and related industries.

ITI supports the effort to improve the energy efficiency of the products. While, we recognize that there are several projects which aim to improve the energy efficiency of the products and have concern on the inconsistency in the standard/methodology and potential confusion, misunderstandings coming from such inconsistency.

Below are more specific comments corresponding to each guiding question provided.

1. What is your feedback regarding the scope of the DCP?

While the CASE team has done an admirable job developing a test method (DCP) for an exceptionally broad and diverse set of products, it remains unlikely that one test method can provide repeatable and reproducible results for all product categories. Industry believes that categories for which well-established and sufficient test methods already exist, such as imaging equipment under the ENERGY STAR® Program Requirements Product Specification for Imaging Equipment: Test Method ([Rev. Dec-2018](#)), should be excluded from the scope of the LPM DCP project.

The primary aim of the LPM Roadmap is to reduce household electricity consumption, as evidenced by findings such as “idle load electricity accounts for 23% of household electricity consumption” (TN239448) and the focus on household products in Appendix A (TN259429). However, many imaging equipment products, including professional imaging products, multifunction devices/printers with a speed of 30 ppm or higher, and medical printers or other medical devices, are clearly designed for professional or office use, not household environments.

By narrowing the scope to exclude these products, the DCP could more effectively align with its primary objective. Moreover, it is likely that the UUT average power tested under the proposed DCP and the sleep mode value obtained from the ENERGY STAR test method would differ only marginally, within a percentage point or two, rendering additional testing redundant. During the voluntary data submission period, we request the flexibility to submit data based on our determination of what constitutes household imaging equipment.

2. Are there any in-scope product categories listed in Appendix A that may not be effectively tested using the CASE Team’s proposed DCP V3?

Yes, imaging equipment is one such category. The most efficient method for testing imaging equipment is outlined in the ENERGY STAR® Program Requirements Product Specification for Imaging Equipment: Test Method. Imaging equipment has specific characteristics that make additional setup steps unnecessary:

- SLEEP mode being the only non-active mode during reboot standby.
- Lack of features that activate via voice commands or environmental monitoring.
- Only one network connection is required, considering user usage patterns.

The proposed DCP V3 requires additional data acquisition and pre-testing setup, making it less efficient compared to the ENERGY STAR® Program Requirements Product Specification for Imaging Equipment. Since all imaging equipment manufacturers use the ENERGY STAR® Program Requirements Product Specification for Imaging Equipment: Test Method, we suggest that data for imaging equipment be evaluated based on the ENERGY STAR® Program Requirements Product Specification for Imaging Equipment: Test Method rather than the LPM. This approach would ensure consistency and efficiency in data reporting for this product category.

6. Do you think the proposed DCP is appropriate for the initial data collection for the LPM Roadmap? If not, why so?

No, the proposed DCP would not be appropriate for the initial data collection for the LPM Roadmap. Many imaging equipment products are tested and registered in accordance with the ENERGY STAR® Program Requirements Product Specification for Imaging Equipment: Test Method. Therefore, it is more efficient to collect data based on the ENERGY STAR® specification for imaging equipment.

7.Question: Is there anything else CEC should consider with regard to the DCP?

Yes, many imaging equipment products are tested and registered in accordance with the ENERGY STAR® Program Requirements Product Specification for Imaging Equipment : Test Method. There are several differences between the DCP and ENERGY STAR testing methods, including the requirement to collect warm-up data. Consequently, imaging equipment manufacturers are required to conduct tests based on both ENERGY STAR and LPM standards, leading to potential confusion. Such double standards should be avoided. The DCP should allow for the use of the ENERGY STAR® Program Requirements Product Specification for Imaging Equipment Test Method.

14. Please provide your recommendations for the CEC to achieve high participation in data reporting.

To achieve high participation in data reporting, it is recommended that for imaging equipment, data should be collected based on the ENERGY STAR® Program Requirements Product Specification for Imaging Equipment: Test Method. Any data points required by the DCP but not included in the ENERGY STAR® specification, such as the collection of warm-up data, should be considered optional. Additionally, any additional setup steps required for data acquisition should be eliminated.

15. Please share any known or possible barriers to high participation in data reporting, including details on the cost of compliance with the voluntary data reporting.

There are several challenges to high participation in data reporting, particularly for imaging equipment manufacturers. One significant barrier is the discrepancy between the data collection procedures (DCP) proposed by the CASE Team and the existing ENERGY STAR® Program Requirements Product Specification for Imaging Equipment : Test Method. Many imaging equipment products are already tested and registered according to the ENERGY STAR® specification, which is widely recognized and accepted in the industry.

The proposed DCP requires additional data acquisition and pre-testing setup steps that are not necessary under the ENERGY STAR® specification. For example, the DCP includes the requirement to collect warm-up data, which adds to the overall data collection efforts. Imaging equipment typically has specific characteristics that make additional setup steps unnecessary, such as:

- SLEEP mode being the only non-active mode during reboot standby.
- Lack of features that activate via voice commands or environmental monitoring.
- Only one network connection required, considering user usage patterns.

These additional data acquisition and pre-testing setup steps would lead to increased testing time and costs, as manufacturers must conduct tests based on both ENERGY STAR and the DCP. This dual testing standard would cause confusion and inefficiencies, ultimately discouraging participation in voluntary data reporting.

To mitigate these barriers and encourage higher participation, it is recommended that the DCP allow for the use of the ENERGY STAR® Program Requirements Product Specification for Imaging Equipment Test

Method. Any data points required by the DCP but not included in the ENERGY STAR® Program Requirements Product Specification for Imaging Equipment Test Method, such as the collection of warm-up data, should be considered optional. Additionally, any additional setup steps required for data acquisition should be eliminated. By recognizing the ENERGY STAR® test method, manufacturers will find it easier and more cost-effective to participate in data reporting, leading to broader and more comprehensive data collection.

The key aim of the LPM Roadmap appears to be reducing household electricity consumption, as evidenced by comments such as “Study found idle load electricity accounts for 23% of household electricity consumption” in TN239448 and the listing of household products in Appendix A of TN259429. Therefore, we would like to request that, during the voluntary data reporting period, we be allowed to submit data based on our determination of what constitutes household imaging equipment.

Thank you for considering our requests. We hope our comment helps to establish a better DCP for LPM roadmap that aligns with the CEC’s objectives.

Sincerely,



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