DOCKETED		
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Document Title:	California Investor Owned Utilities Comments: Computers - Response to Standards Proposal	
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CA IOUs_Title 20 Computers_Workshop_2016-04-26

Additional submitted attachment is included below.

Computers

Response to Standards Proposal

Presented to the California Energy Commission

April 26, 2016











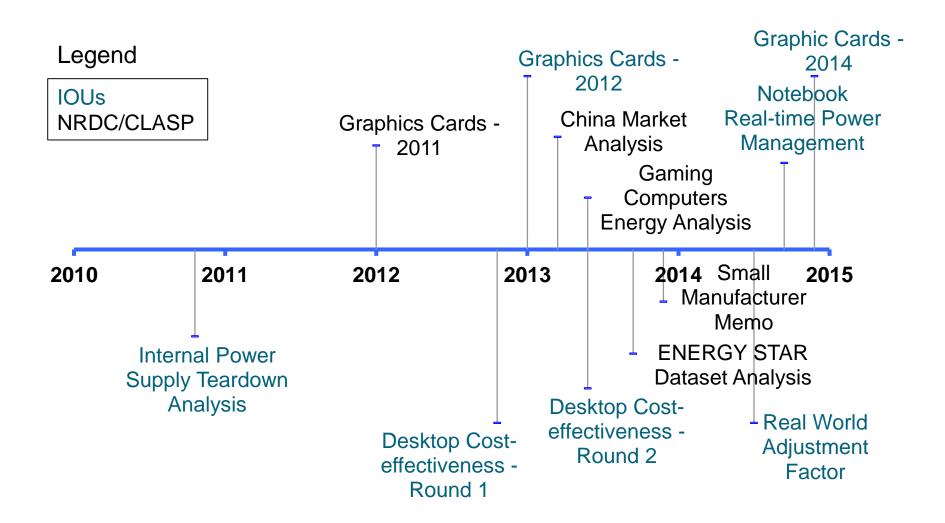
Why Standards?



- Despite progress, still significant energy savings opportunities.
- Cost-effective and feasible solutions.
- State policy goals.

- IOUs generally support the CEC's proposal.
- Several areas for improvement.

Supporting Data Before 2015 12+ testing & research projects



Activities Since Jan 2015

- Desktop demonstration
- Ongoing engagement with ITI, including:
 - 2 deep dives (Folsom July 2015 and hosted October 2015)
 - Joint submittal re: definitions
 - Shared proposals on framework
- Additional analysis and submissions / addendums to Standards Proposal, including:
 - Discrete graphics cards
 - Security Features
- Review & modification to certification requirements
- 2nd round of compliant desktop demonstration
- AIO comparison and tear-down project (NRDC)

Expandability Adder

IOUs support CEC's expandability framework to address needs of highly expandable desktop systems

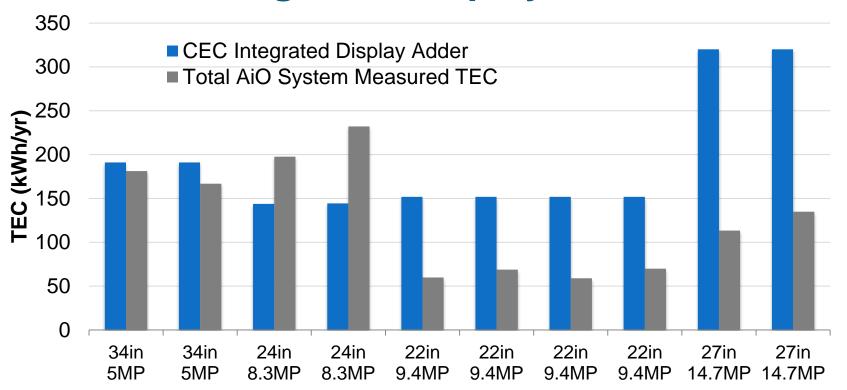
Minimal Expansion	Mainstream	Highly Expandable
No adder	Adder increases with system expansion	Systems excluded from TEC requirements

Increasing Expansion

Two key areas for refinement and clarification:

- Expandability score calculations
- Criteria for exemption from TEC requirements

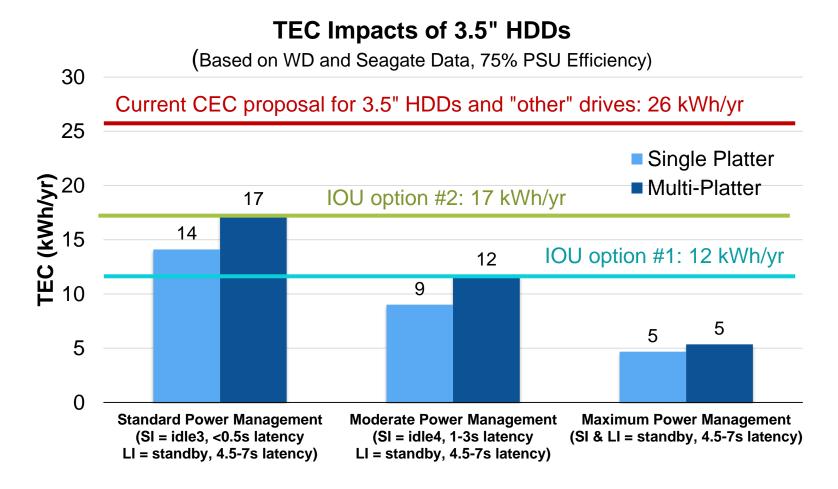
Integrated Display Adder



- CEC proposed adder is too lenient for resolutions > 2 MP and large sizes. Adder often exceeds TEC of entire system.
- Proposed EPD factors amplify problem
- The IOUs recommend:
 - o a hyperbolic adder equation
 - lower allowances for EPDs

Secondary Storage Adder

CEC should tighten secondary storage adders for 3.5" HDDs (12-17 kWh/yr possible with modest PM)



Lacking data, adder for "other" drives should match solidstate memory (0.5 kWh/yr)

Power Supply Efficiency Requirements Should Extend to All Desktops

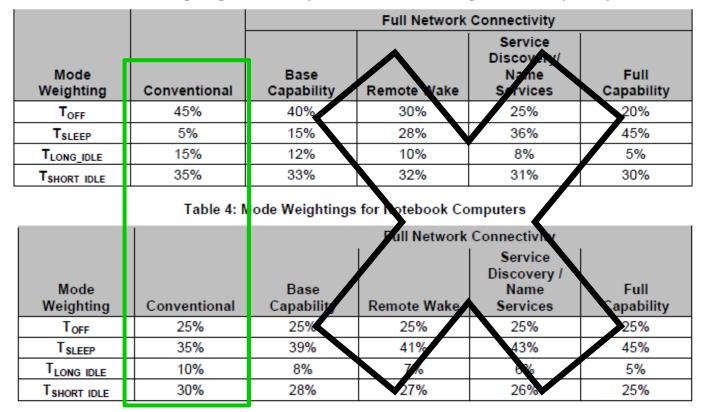
	CEC Staff Proposal	IOU/NRDC Proposal
Workstations	80 PLUS Gold	80 PLUS Gold and power factor levels
High- Performance/Expandability DTs*		
Mainstream DTs * Definition/scope to be defined	No PSU requirements	80 PLUS Bronze and power factor levels

- Guarantees energy savings in active modes
- Similar stringency to EU ErP power supply requirements
- Prevents backsliding on over a decade of power supply efficiency market transformation efforts internationally

Duty Cycle: Need to Close Loophole

ENERGY STAR 6.1 Specification

Table 3: Mode Weightings for Desktop, Thin Clients, and Integrated Desktop Computers



- Data informed, although should be updated
- No known data
- No existing test method to determine type of connectivity
- Could result in understated TEC by up to ~10%.

Notebook Levels Far Too Lenient; Missed Savings Opportunity



- 90% of ENERGY STAR v6.1 models meet Staff Report #1 standard levels (ITI 2015, April Workshop)
- 97% of '15-'16 ENERGY STAR v6.1 models meet Staff Report #2 standard levels

Recommendation:

- Reduce base allowance:
 - **11 kWh** (~50% QPL pass rate)
 - **16 kWh** (~75% QPL pass rate)
- Reduce displays adder by at least 35% (~50% QPL pass rate)
- Categorization for high-specification notebooks

Cost-effective savings: up to ~290 GWh/yr, ~\$47 M/yr

Cost-effective & Feasible Standards



Generally Support, Suggested Modifications:

- Expandability adder
- Secondary storage adder
- Integrated display adder
- Power supply requirement
- Duty cycle
- Notebook base allowance and adders