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Docket Number 14-AAER-2

Additional submitted attachment is included below.



May 20, 2016

Andrew McAllister
Commissioner
California Energy Commission
Sacramento, CA 95814

Subject: Docket Number 14-AAER-2

Dear Commissioner McAllister:

On behalf of Sierra Club and its more than 380,000 members and supporters in California, I submit the following comments on the Revised Analysis of Computers, Computer Monitors, and Signage Displays published on March 30, 2016.

Sierra Club California thanks you for the opportunity to comment on the proposal, which would be the first of its kind in the country for these products and will pave the way for other states and the federal government to follow suit.

These standards, in part, would target various computer types which include notebooks, desktop computers, work stations and small-scale servers. However, the standards would only apply the products when they inactive or idle, which means they will have no impact on active performance. Additionally, these proposed standards are performance-based to ensure that even the highest performance machines can comply.

The standards would also target displays such as computer monitors and signage displays by requiring the right combination of modern technology for backlighting and using higher efficiency electronic components within the display.

Computers and displays are among the largest energy consumers in our homes and offices. According to the CEC, they use about 8.3 billion kilowatt hours annually. A recent study by the University of California Plug Load Research Center determined that though office computers are in the "on" position 77% of the time, about 80% of that is spent inactive. As a result, the Energy Commission has identified the potential for significant savings within this category.

The standards for computers, computer monitors, and signage displays will go into effect in 2018. We appreciate the Energy Commission's efforts to develop standards for these products well before national standards are established. The federal standards are currently under review at the United States Department of Energy, which could take seven to eight years. That means that California's new appliance standards are likely to become the standards that drive manufacturing of these products across the country and perhaps the world.

When the computer and display efficiency standards become the national benchmark, they will save Californians \$402 million annually- after stock turn over, 2501 gigawatt hours and 0.783 million metric tons of carbon dioxide equivalents.

These efficiency standards are a critical component in a portfolio of actions taken to protect the environment and to meet California's climate goals set forth in Senate Bill 350 (De Leon, 2015).

Respectfully Submitted,

A handwritten signature in black ink, appearing to read "Edward Moreno".

Edward Moreno
Policy Advocate