

DOCKETED

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Comment Received From: Christopher Granda

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Additional submitted attachment is included below.

**Appliance Standards Awareness Project
American Council for an Energy Efficient Economy
Consumer Federation of America
National Consumer Law Center
Northwest Energy Efficiency Alliance**

May 23, 2016

Commissioner McAllister
California Energy Commission
Dockets Office, MS-4
Re: Docket No. 14-AAER-2
1516 Ninth Street
Sacramento, CA 95814-5512

Dear Commissioner McAllister,

This letter constitutes the comments of the Appliance Standards Awareness Project, the American Council for an Energy Efficient Economy, the Consumer Federation of America, the National Consumer Law Center, and the Northwest Energy Efficiency Alliance (the signatories) regarding the Appliance Efficiency Pre-Rulemaking for computers, computer monitors, and signage displays, Docket No. 14-AAER-2. We strongly support the California Energy Commission's (CEC) efforts to develop computer and display standards, which build on the CEC's successful track record establishing standards for other electronic products.

ASAP commends the CEC's work on this docket and supports the CEC's latest proposed standards for computers and monitors contained in the Final Draft Staff Report published on March 30, 2016. The proposed California state standards are the right move for California, and for the nation. ASAP supports the scope and technical recommendations proposed by the California investor-owned utilities, the Natural Resources Defense Council and the Consumer Federation of America. The following are our complementary comments relating to the proposed standards in the broader policy context.

1. **Limiting the growth in electricity consumption from plug loads is an essential part of an overall strategy for meeting emissions reductions goals.** Total electricity consumption in California is increasing relative to projected usage, and plug loads make up an increasing share of that consumption.
2. **Consumers will benefit.** The proposed standards are projected to reduce computer and display energy consumption by one third. They would put \$400 million in electricity bill savings back in Californians' pockets and, as has been the case with many other energy efficiency standards,

California's leadership would also potentially benefit consumers across the US and around the world.

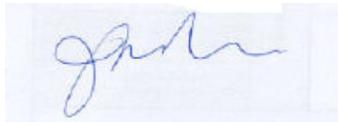
3. **Continuing business-as-usual for computers and displays will not necessarily get us the efficiency we need.** While there has been general progress on computer and display efficiency over the last decade, manufacturers provide new features without consideration for energy efficiency per se, which can result in increased energy consumption. The proposed standards will make energy efficiency a higher priority during product design, and harness innovation to drive down power consumption.
4. **The proposed efficiency standards are reasonable and well designed.** CEC's proposed standards are performance-based, allow manufacturer flexibility, and are relevant to products available in the current market.
5. **The proposed mandatory standards will complement ENERGY STAR specifications.** ENERGY STAR should define the leading edge of energy efficiency while mandatory standards define the minimum allowed efficiency. The CEC standards will provide a new baseline for ENERGY STAR to build upon, yielding higher savings for both ENERGY STAR and non-ENERGY STAR purchasers.
6. **The computer and display industry exemplifies innovation** and the ability to meet technical challenges. We are confident that the computer industry will be able to comply with the proposed standards by the proposed deadlines. Manufacturers' comments during the workshop were generally constructive and data driven, if typically pessimistic about industry's ability to meet the proposed standard's technical requirements at a reasonable cost. This is to be expected, but the actual experience with previous CEC standards for electronic products (external power supplies, TVs, battery chargers) suggests that industry will meet new efficiency requirements more cost-effectively than expected, ahead of schedule, and without negative impacts on their markets.
7. **The success of notebook and tablet computers proves the energy efficiency potential of computers and monitors.** Notebooks and tablets must be energy efficient in order to maximize battery life, and they manage to achieve this efficiency without significantly sacrificing performance relative to desktop computer systems. Laptops have steadily gained market share on desktops because customers get mobility without sacrificing features or speed. Even though laptops are more energy efficient than desktops, there is a range of efficiencies within each product category, and room for improvement.
8. **California is able to take timely action.** The legally required lead time between publication of a final federal efficiency standard and the compliance date is five years, a period longer than the product innovation cycle for computers and displays. This long lag between a standards publication and compliance date means that by the time a federal standard might come into effect the computer and display markets will have changed substantially from what they were when the standard was designed. Fortunately, CEC standards may be revised on a quicker schedule. We expect that manufacturers will align their national product development and marketing campaigns for computers, monitors and displays to the California standards, making them de facto national standards. Recent DOE analysis in the battery charger docket showed that California's battery charger standards resulted in 95% compliance on a national basis and we expect a similar result for computers.
9. **The signatories are looking to California to lead the way for computers and displays,** and to adopt efficiency standards which can be updated rapidly enough that they remain relevant to the current market. We will also work with other states who are interested in following California's lead.

Thank you for your consideration of these comments.

Sincerely,



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