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TechNet Comments to 17-AAER-12 Roadmap Pre-Rulemaking

Additional submitted attachment is included below.

TECHNET
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INNOVATION ECONOMY

TechNet | Telephone 916.594.7987
1001 K Street, 6th Floor, Sacramento, CA 95814

June 16, 2017

Commissioner Andrew McAllister
California Energy Commission
1516 9th Street
Sacramento, CA 95814

Re: Phase 2 Pre-Rulemaking for 2017 Appliance Efficiency Standards

Dear Commissioner McAllister,

TechNet appreciates the opportunity to provide brief comments in response to the California Energy Commission's invitation to participate in the Phase 2 Pre-Rulemaking for 2017 Appliance Efficiency Standards and in particular to comment on our shared goal of a new regulatory framework that can drive energy efficiency while simultaneously enabling the Internet of Things (IoT) innovation across a wide, growing range of applications.

TechNet is the national, bipartisan network of technology CEOs and senior executives that promotes the growth of the innovation economy. TechNet's diverse membership includes dynamic startups to the most iconic companies on the planet and represents more than two million employees in the fields of information technology, e-commerce, advanced energy, biotechnology, venture capital, and finance. As the Voice of the Innovation Economy, TechNet advances public policies and private sector initiatives at the federal, state, and local levels that make the United States the world leader in innovation. We champion policies that foster a climate of innovation and competition, allowing America's tech industry to flourish and are pleased to engage in this proceeding as it will set the stage for supporting the evolution of the IoT.

The IoT offers great promise for the future. Adaptive, connected systems will become pervasive. Data and analytics will drive increased awareness and new insights about our environment and new data-driven services will emerge, much of this being driven by the innovation and technology of our member companies.

For example, Smart home, building and Connected City systems will enable multiple beneficial features like Asset Management, Bio-adaptive Lighting, Scene Management, Space Management, Parking Management, Incident Detection, Adaptive Crowd and Traffic Control, Environmental Monitoring, Indoor/Outdoor Navigation and Lighting Energy Optimization to mention but a few. These smart systems will cover a wide range of application segments and will be composed of products, devices, sensors and infrastructures.

To fully enable the benefits, features and functionality, the systems are increasingly incorporating additional (secondary) functions like energy storage, sensing, imaging and high network availability functions. It is obvious that these additional functions will consume some additional energy and cannot be switched off completely without being unplugged. The power consumption of these devices in their Low-Power modes (off mode, standby mode and network standby mode) is emerging as a crucial issue and one that, if not addressed and managed carefully, threatens to impede the implementation of networking-based intelligence and the growth of the entire Internet of Things with all its associated benefits. In other words, we encourage the California Energy Commission to look at the entire eco-system of utilization and efficiency rather than any one application in isolation.

Today, the low-power mode definition allocates all power consumption to a single metric. We support your new approach to energy regulation via the roadmap process including the horizontal and vertical policy models. We urge shifting focus from *Component* performance to *System* performance and from an emphasis on *Installed Power* to a focus on actual *Consumed Power* while recognizing the separation between the various functions and secondary applications embedded within the system infrastructure.

Looking ahead, a new regulatory framework can drive energy efficiency while enabling IoT innovation across a wide, growing range of application areas.

TechNet applauds the CEC's decision to pursue a roadmap approach towards developing a regulatory framework and policy towards Low-Power mode. Advanced insights from connected systems are currently providing new opportunities for significant energy savings well beyond those realized by the individual components. The nature and reach of the connected infrastructure is enabling a new class of data-driven, high-value applications delivering advances in energy and operational efficiency, safety and security

and more. Separation between the various functions and other applications will be central to effective and appropriate regulation of system efficiency while enabling innovation in a broad range of data-driven applications and services.

Given the rapid development of the IoT and pace of innovation, taking a collaborative approach with stakeholders to develop a roadmap for product efficiency in terms of standby power consumption is a very prudent approach that is and will continue to be appreciated by TechNet and our membership. We look forward to collaborating with the CEC to make an energy efficient Internet of Things a reality.

I am always available to provide further information, answer questions or discuss our comments provide. I can be reached at adeveau@technet.org.

Respectfully,

Andrea Deveau
Vice President, State Policy and Politics