

## DOCKETED

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*Comment Received From: Mark Hess*

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## **Joint Request**

*Additional submitted attachment is included below.*

July 24, 2017

California Energy Commission  
Dockets Office  
Appliance Energy Efficiency Standards Rulemaking  
1516 Ninth Street, MS-4  
Sacramento, CA 95814-5512

Re: Request to Suspend Deadline for Proposals, Docket No. 17-AAER-11, Set-Top Boxes

Dear Commissioners:

All of the nation's major multichannel video programming distributors (AT&T/DIRECTV, Comcast, Charter Communications, DISH, Verizon, Cox, Cablevision, and CenturyLink), the major manufacturers of set-top boxes (ARRIS, Technicolor, and EchoStar Technologies), these industries' principal trade associations (the Consumer Technology Association and NCTA – The Internet & Television Association), and the Natural Resources Defense Council (NRDC), the American Council for an Energy-Efficient Economy (ACEEE), and the Appliance Standards Awareness Project (ASAP) submit this joint letter to urge the Commission to suspend the September 1, 2017 deadline for proposals related to the Commission's consideration of a "roadmap" for set-top boxes.

On June 16, 2017, these parties previously reported in a [joint statement](#) to the Commission that the CEC's objectives for a roadmap for set-top boxes can generally be fulfilled by an extension of the Voluntary Agreement for Ongoing Improvements in the Energy Efficiency of Set-Top Boxes ("VA"), which currently is set to expire after the release of the 2017 annual report in 2018. The parties are optimistic that they will be able to reach consensus on the terms of a renewed VA and are aiming to complete that process by the end of 2017.

On July 18, 2017, Commission staff issued the *Invitation to Submit Proposals & Notice of Staff Webinar*, which, among other things, "invites interested parties to submit proposals for standards, test procedures, labeling requirements, and/or other measures that will improve the efficiency and reduce the energy or water consumption of the appliances that were identified for Phase 2 appliance efficiency regulations and roadmaps" including a set-top box roadmap.

The preparation of proposals to the Commission in the midst of this negotiation process would be counterproductive, and therefore we request that the Commission suspend the deadline for proposals pending further status updates from the parties. The parties would be happy to commit to update the Commission no later than December 31, 2017 and/or at such times that the Commission may desire.

The public interest and the goal of energy efficiency would be best served by affording the parties the ability to focus their efforts on the renewal of the VA rather than by the diversion of their resources to develop proposals that each of them hope will in any event be mooted by subsequent events. Parties would be constrained in their ability to fully present their positions to the Commission at a time when they are attempting to negotiate terms to achieve the best outcome. Even if proposals were submitted now, the Commission would be deprived of the benefit of a complete record without the terms of the VA that will apply after this year.

In the meantime, the Commission and other members of the public can continue to monitor the substantial energy savings secured by the current VA at [www.energy-efficiency.us](http://www.energy-efficiency.us), which includes links to all reports and the energy characteristics of all set-top box models purchased by the service provider signatories since the beginning of 2014. D+R International, the independent administrator and auditor of the agreement, will shortly release the 2016 annual report that will document cumulative savings of nearly 17 TWh, saving consumers more than \$2 billion and avoiding nearly 12 million metric tons of CO<sub>2</sub> emissions nationwide, while affording service providers room to innovate with new products and features.

Respectfully submitted,

American Council for an Energy-Efficient Economy (ACEEE)

ARRIS

AT&T/DIRECTV

Cablevision

California Cable & Telecommunications Association

CenturyLink

Charter Communications

Comcast

Consumer Technology Association

Cox Communications

DISH Network

EchoStar Technologies

Natural Resources Defense Council (NRDC)

NCTA – The Internet & Television Association

Technicolor

Verizon