

## DOCKETED

<b>Docket Number:</b>	17-AAER-12
<b>Project Title:</b>	Low-Power Mode & Power Factor
<b>TN #:</b>	221199
<b>Document Title:</b>	NCTA â€™ The Internet & Television Association Comments Letter in support of ARRIS submission
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	NCTA â€™ The Internet & Television Association
<b>Submitter Role:</b>	Public
<b>Submission Date:</b>	9/18/2017 11:24:49 AM
<b>Docketed Date:</b>	9/18/2017

*Comment Received From: NCTA â€œ The Internet & Television Association*

*Submitted On: 9/18/2017*

*Docket Number: 17-AAER-12*

**Letter in support of ARRIS submission**

*Additional submitted attachment is included below.*



The Internet & Television Association  
25 Massachusetts Avenue, NW | Suite 100  
Washington, DC 20001  
(202) 222-2300

Neal M. Goldberg  
Vice President &  
General Counsel  
o (202) 222-2445 e ngoldberg@ncta.com

September 18, 2017

California Energy Commission  
Docket Office, MS-4  
1516 Ninth Street  
Sacramento, CA 95814-5512

**Re: Docket No. 17-AAER-12 (Low-Power Mode & Power Factor)**

Dear Commissioners:

NCTA – The Internet & Television Association writes to express support for ARRIS’s supplemental letter filed on September 11, 2017 in this proceeding regarding power factor.

ARRIS has raised concerns that, if the Commission were to impose power factor standards on small network equipment this would have a distorting effect on the overall power factor for the home. ARRIS explained that typical households include both products with capacitive inputs and products with inductive inputs, and, as detailed in its supplemental filing, it conducted measurements demonstrating that these two types of products balance each other out and result in a better power factor for the home.

NCTA agrees with ARRIS’s conclusion that requiring power factor correction only for capacitive input devices like small network equipment would skew the balance of capacitive and inductive loads in the home, causing the overall power to become more inductive, and resulting in a worse overall power factor for the home. This would lead to utilities having to generate more energy than needed for the home, while having no impact on the customer’s energy usage. In addition, power factor standards would come at a cost to consumers, in the form of higher retail equipment costs.

The better course would be for the Commission to consider small network equipment in its set-top box docket rather than this more diverse proceeding. And, as NCTA explained in its submissions in that docket, the Commission should defer further action in that docket pending completion of the discussions to renew the Voluntary Agreements that have secured energy efficiency for set-top boxes and small network equipment far more effectively than could regulation.

Respectfully submitted,  
/s/ Neal M. Goldberg

Neal M. Goldberg  
Vice President and General Counsel