DOCKETED

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ITI/TechNet Comments on Express Terms (45-Day Language)

Additional submitted attachment is included below.

CEC Computers, Computer Monitors, and Signage Displays (Docket #16-AAER-15)

Appliance Efficiency Rulemaking

ITI/TechNet Comments on Express Terms (45-Day Language) - Appliance Efficiency Standards Rulemaking for Computers

November 6, 2017

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EXECUTIVE SUMMARY

After approximately four years of constructive dialogue with California Energy Commission (CEC) staff and other stakeholders, ITI and TechNet (also referred to hereafter as "industry") supported the adoption of the Computers, Computer Monitors, and Signage Displays regulation on December 14, 2016. We share CEC's commitment to increase energy efficiency for our products, and we've already begun adjusting our product cycles and processes to meet the rulemaking's ambitious targets.

Over the last few months, we've been working with CEC staff to obtain clearer guidance about the regulation's implementation, and in this process, raised three concerns and recommendations pertaining to the Mobile Workstation, Mobile Gaming System, and Discrete GPU definitions. We expressed these concerns at the May 2017 CEC Business Meeting, and in subsequent CEC staff meetings and industry discussions. Over the last several months, CEC staff and industry successfully worked together to address these concerns.

Industry supports the proposed changes in the 45-day language. We also appreciate the opportunity to contribute Frequently Asked Questions (FAQs) to CEC staff, and look forward to seeing the FAQs published on the CEC website. This additional guidance will enable successful implementation of CEC's computers and displays standard.

We reiterate our commitment to continued engagement with CEC and other stakeholders to support the implementation of the rule.