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Comment Received From: Erica Thomas
Submitted On: 10/8/2021
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ITI comments on IOU proposals for CEC regulation of appliance energy efficiency for low power mode (17-AAER-12)

Additional submitted attachment is included below.

October 8, 2021

Commissioner J. Andrew McAllister
California Energy Commission (CEC)
1516 Ninth Street Sacramento
CA 95814-5512

Docket Unit, MS-4

Re: Docket No. 17-AAER-12

via: <https://efiling.energy.ca.gov/Ecomment/Ecomment.aspx?docketnumber=17-AAER-12>, and
docket@energy.ca.gov (docket number “17- AAER-12” and “Low-Power Mode & Power Factor)

Subject: ITI comments on IOU proposals for CEC regulation of appliance energy efficiency for low power mode (17-AAER-12)

Dear Honorable Commissioner J. Andrew McAllister:

The Information Technology Industry Council (ITI) is pleased to work again with CEC on its proposed rulemaking to modify computers and computer monitors appliance efficiency regulations to incorporate new technologies and innovations.

The Information Technology Industry Council (ITI) is the premier global advocate for technology, representing the world’s most innovative companies. Founded in 1916, ITI is an international trade association with a team of professionals on four continents. We promote public policies and industry standards that advance competition and innovation worldwide. Our diverse membership and expert staff provide policymakers the broadest perspective and thought leadership from technology, hardware, software, services, and related industries.

ITI members are aware that the Investor Owned Utilities (IOU) have proposed that CEC develop a data collection procedure for products in order to develop a test procedure for efficiency of appliances. ITI is concerned about the overall approach being proposed by the IOUs. Our members believe it would not make sense to collect data without a test method in mind, particularly for products for which a robust test standard already exists (such as for product categories covered in Title 20 and/or ENERGY STAR). For example, the ENERGY STAR Method for Determining Imaging Equipment Energy Use Rev. Dec-2018 is the accepted United States Department of Energy (DOE) standard and should be instructed for use to ensure reproducibility. We request that the CEC collect additional industry feedback specific to each product category in order to build an appropriate procedure that ensures the integrity of a data collection request.

ITI members also have concerns about Page 5 & Test Procedure Section 7.3.6 & 7.4.4. Our concern is that all of these sections talk about a Device Under Test (DUT) with a stepwise or Multiple Low Power Modes. If a DUT has multiple Low Power Modes, each need to be measured independently and then described in the data collection form. There cannot be a combination of 2 Low Power modes and a single reported description. There might be different DUT that have different timings for each mode and the length of time and value of each mode should be reported. Averaging the data of 2 Low Power modes does not provide useful data. The Test Procedure in Sections 7.3.6 and 7.4.4 proposes that companies report the average power during the last 15 (P_last15). A more useful data collection would be to report the power for each “Step” or Low Power mode along with the length of time for each mode.

The federal battery charger requirement does record standby power and report it publicly but does not have a limit. Based on the public DOE CCMS database, roughly 97% of the models show standby power is less than or equal to 0.5 watts. Standby power represents a significant factor to comply with the federal battery charger requirement. Battery chargers that consume significant standby power will not be able to meet the federal requirements. For small battery chargers under 100 W, such as a cell phone, a standby power over 1 W would likely result in exceeding the battery charger limits. As such, for most low-power chargers, compliance with the federal requirements would demonstrate a low standby power. Accordingly, we do not think federally regulated battery charger systems should be included in the scope of the CEC Low Power Mode Data Collection Procedure.

ITI would like to take this opportunity to thank Commissioner McAllister and CEC staff for years of collaboration on appliance energy efficiency standards. If helpful, I would be happy to answer any questions and/or arrange a meeting with our members and CEC staff to discuss the issues raised in this letter in more detail.

Best regards,

A handwritten signature in black ink that reads "Erica Thomas". The signature is written in a cursive, slightly slanted style.

Erica Thomas
Director for Policy, Environment, Sustainability and Regulatory Affairs
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