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in Response to the Energy Commission Staff's 8-25-21 Presentation

Additional submitted attachment is included below.



Pacific Gas and
Electric Company®



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SOUTHERN CALIFORNIA
EDISON®
Energy for What's Ahead®

October 11, 2021

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California Energy Commission
1516 Ninth Street, MS-25
Sacramento, CA 95814

RE: California Investor-Owned Utility Codes and Standards Enhancement Team Response to Workshop Regarding the Data Collection Procedure for the California Energy Commission's Low Power Mode Roadmap

Docket Number: 17-AAEER-12

Dear Dr. Pasha:

This letter comprises comments of the Pacific Gas and Electric Company (PG&E), San Diego Gas and Electric (SDG&E), and Southern California Edison (SCE) in response to the efforts of the California Energy Commission (CEC) to develop a Data Collection Procedure (DCP) for the Low Power Mode (LPM) Roadmap.

The Codes and Standards Enhancement (CASE) initiative supports the CEC's efforts to update California's Appliance Efficiency Regulations (Title 20). The California Investor-Owned Utilities sponsored this effort (herein referred to as the Statewide CASE Team). The program goal is to prepare and submit proposals that will result in cost-effective enhancements to improve the energy and water efficiency of various products sold in California. The Statewide CASE Team appreciates the opportunity to provide the following comments.

The CEC held a public workshop on August 25, 2021 to (1) discuss the structure and steps of the LPM Roadmap, and (2) review the CASE Team's DCP proposal. The Statewide CASE Team continues to support the CEC's efforts to develop a horizontal LPM Roadmap to reduce the energy use of a wide range of products when not performing their primary functions for an end user. Our specific comments related to topics discussed in the workshop are contained in the paragraphs below.

1. The Statewide CASE Team supports the CEC's planned structure and target-setting approach for the LPM Roadmap.

The Statewide CASE Team agrees with the CEC's proposed approach for the LPM Roadmap, specifically the CEC's proposed "clustered horizontal" structure for power targets. This structure will allow the CEC to set targets that are tailored to the functions that a particular product provides to the user. We believe this approach has the potential to achieve energy savings without impeding the development of new functions and products, particularly because the Roadmap's iterative target-setting and evaluation process will allow updates for these new developments.

2. The Statewide CASE Team agrees with the CEC’s approach to measure power draw of products when in an “inactive” state.

The Statewide CASE Team supports the CEC’s approach to measuring LPM as the condition of a product when not providing its primary function(s), and our proposed DCP characterizes and measures the power draw of products in this "inactive state." The measurement approach applies to the wide range of products in the LPM Roadmap scope and avoids the need to define and measure discrete operating modes, which are often product specific. In addition, the average power draw of the inactive state measurement approach incorporates modes and duty cycle behavior, thereby providing a realistic characterization of the energy use of a product when it is not providing its primary function(s).

In conclusion, the Statewide CASE Team reiterates our support of CEC’s Low Power Mode Roadmap and the development of a DCP. We thank the CEC for the opportunity to be involved in this process.

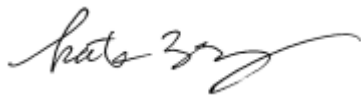
Sincerely,



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Manager, Codes & Standards
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