

**DOCKETED**

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*Comment Received From: Sara Berl*  
*Submitted On: 11/30/2023*  
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**Entertainment Software Association Letter on DCP Version 3**

*Additional submitted attachment is included below.*



November 30, 2023

**Submitted Electronically**

California Energy Commission  
Docket Unit, MS-4  
Docket No. 17-AAER-12  
715 P Street  
Sacramento, California 95814

**Re: Low Power Mode Roadmap (17-AAER-12): Entertainment Software Association’s Request for Comment on the Codes and Standards Enhancement Team’s Proposed Low Power Mode Data Collection Procedure, Version 3**

The Entertainment Software Association (“ESA”) submits this letter in response to the California Investor Owned Utilities’ Codes and Standards Enhancement Team’s (“CASE Team”) latest proposal for the Low-Power Mode (“LPM”) Roadmap Data Collection Procedures (“DCP”), dated February 3, 2023 and marked as Version 3 (hereinafter “DCP Version 3”).

ESA requests that the California Energy Commission (“Energy Commission” or “CEC”) provide a formal opportunity to comment on this latest DCP proposal to ensure that the input of all stakeholders is fully considered in the development of the LPM Roadmap, which requires further refinement before it is finalized.

**1. The ESA and Its Members Support Continued Development of the LPM Roadmap**

ESA is primarily focused on the DCP proposals as they may apply to **video game consoles**.<sup>1</sup> ESA and its members continue to support the Energy Commission’s goal to improve energy efficiency for consumer electronics in California’s homes. ESA members have long engaged in self-regulatory efforts across the globe to measure and improve the energy efficiency of their devices as technology evolves.

Consistent with those past efforts, ESA has been an active participant in the LPM Roadmap proceeding to help ensure a workable framework. Combined with ESA members’ ongoing efforts to provide energy efficient products and experiences for consumers, ESA’s

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<sup>1</sup> ESA is the voice and advocate of the U.S. video game industry. Its membership includes the three major console makers, among other game companies: Sony Interactive Entertainment, which makes and operates the Sony PlayStation platform; Microsoft, which makes and operates the Microsoft Xbox platform; and Nintendo, which makes and operates the Nintendo Switch platform.

members can provide important industry insight that should be thoroughly considered as the LPM DCPs are finalized.

ESA recognizes and appreciates the CASE Team's revisions to the data collection procedures from the May 2021 LPM DCP proposal, which was workshopped and made available for comment that year. ESA acknowledges several improvements made in DCP Version 3, including, from a game console perspective: (1) the updated treatment of how to handle multiple game console peripherals; (2) clarification that any rechargeable batteries (including those in peripherals) should be fully charged before testing; (3) the new requirement that software, including any apps, be updated before testing; and (4) in Appendix B, updating the game console example to replace "save" with "suspends the game to RAM." With these changes, the LPM Roadmap DCP proposal has been greatly improved.

## **2. There Should Be a Public Comment Opportunity on DCP Version 3**

However, there are additional changes to DCP Version 3 that should be incorporated to further fine-tune the DCP. Providing a formal comment opportunity in the LPM Roadmap docket will ensure that valuable insight from all stakeholders is represented in this proceeding and reflected in the final DCP. Such comments will assist in reaching a final DCP that provides greater clarity and certainty on the methods that will be employed for testing, which is fundamental to reproducibility of energy efficiency test results. Comment on DCP Version 3 will also enhance testing processes so that test results more accurately reflect the power draw for the large swath of product categories that will be in the LPM Roadmap's scope.

## **3. The DCP Continues to Improve But Further Modifications Are Needed**

ESA is concerned with the following aspects of the latest DCP proposal, on which we plan to file more detailed comments should the Commission open a formal comment opportunity on DCP Version 3.

1. The Primary Function of Game Consoles is to Play Video Games. For game consoles, there is *one* primary function or main purpose: to play video games. There are not multiple primary functions, as currently suggested in DCP Version 3.
2. Game Consoles Must Be Properly Categorized in a Horizontal Cluster Framework. Game consoles are vastly different from other products in the multimedia category and should be categorized as their own, individual product category. For example, unlike streaming devices, game consoles can operate as stand-alone devices that rely on local processing. This enables game consoles to operate on low-bandwidth networks or engage in gameplay with no network connectivity. Given the vastly different functions and energy profiles of streaming devices versus dedicated game consoles, it does not make sense to put them into the same category.
3. The Horizontal Test Method Must Account for Certain External Factors. The horizontal test method should account for product activity that could result in a distorted energy consumption during a test (e.g., software updates). This type of circumstance is

accounted for under the European Union’s networked standby standard (EN 50643:2018), but it is not clearly accounted for in DCP Version 3.

4. DCP Version 3 Should be Revised to Address Test Reproducibility and Repeatability Concerns. The approach to reproducibility and repeatability in DCP Version 3 requires further clarification and refinement to help ensure that manufacturers are able to perform their own testing in a manner that yields consistent results with those reported by the CASE Team or the CEC. In addition, it is necessary to consider alternative solutions to address situations when reproducibility and repeatability cannot be improved by modifying the test method. We look forward to the opportunity to expand upon these concerns in our public comments.

These are important concerns that require further development and discussion among stakeholders prior to the Energy Commission’s adoption of a final LPM DCP.

### **Conclusion**

The Entertainment Software Association acknowledges important, positive improvements have been made to the DCP. However, there remain some key areas where further refinements are needed: (1) game consoles have only one primary purpose (gameplay), not multiple primary purposes; (2) game consoles should be in their own category and not slotted into the multimedia category; (3) the horizontal test method must account for external factors that may distort energy consumption results; and (4) more work needs to be done to address concerns regarding reproducibility and repeatability of test results. Accordingly, ESA requests that the Energy Commission provide stakeholders an opportunity to publicly comment on the CASE Team’s Low Power Mode Roadmap Data Collection Procedure Proposal, Version 3.

Please contact me at [sberl@theesa.com](mailto:sberl@theesa.com) if you require any further information or have any questions regarding the content of this request. We look forward to further engagement and discussion with the Energy Commission and the CASE Team on these issues.

Sincerely,

/s/ Sara Berl

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