

Comments on CEC computers and monitors standards proposal

October 14, 2016

Commission Andrew McAllister
California Energy Commission
1516 Ninth Street, MS-29
Sacramento, CA 95814-5512

Dear Commissioner McAllister,

On behalf of the undersigned organizations, we commend the California Energy Commission (CEC) for its proposed energy efficiency standards for computers and monitors. The standards are expected to cut unnecessary energy waste while saving California consumers and businesses millions on their electricity bills in the process. This is particularly important for low-income families who spend a disproportionate share of their income on energy costs and who may be stuck using the cheapest, most inefficient models on the market.

The CEC's proposal is generally strong and balanced; it requires manufacturers to upgrade their less efficient products to achieve minimum levels of efficiency. The proposed standards are performance-based and technology-neutral, and will foster innovation and minimize compliance costs. The CEC's projected savings of \$370 million annually will put money back in consumers' pockets and boost California's economy, while also reducing power plant pollution and helping to bring the state closer to its climate goals.

However, the CEC faces a real challenge in ensuring that the standards actually deliver these promised savings: given the rapid pace of evolution in computer technology, for these efficiency standards to be effective, it is critical that you minimize potential loopholes. As the standard is currently written, some machines are exempted or given a large allowance because they have premium or emerging features. While these features often are rare in today's market, and the initial implementation often draws a little extra power, they could be commonplace, or even ubiquitous, four years from now when the second stage of the standard goes into effect, and no longer require any extra power. Continuing to give them an overly generous allowance has the potential to drastically reduce the standard's benefits, and is a point of serious concern.

For example, the allowance for "variable refresh rate", a feature that provides for smoother motion scenes on monitors that are specialized for gaming applications, gives away a 35 percent extra energy allowance for all monitors that have this feature. While only a small number of models on the market today have this feature, it may become common across a large share of the monitor market over the next few years. By that time, it will most likely require no extra power (35 percent is already overly generous today), which will effectively relax the standard by 35 percent for many monitors, creating a potentially large loophole in the standards which would wipe out much of the expected savings.

Comments on CEC computers and monitors standards proposal

We ask that the CEC ensure the projected energy savings and financial benefits do not evaporate through loopholes and overly generous allowances, and that California consumers, and particularly businesses, schools, and low-income families who are affected most by computer energy waste, get to experience the promised benefits of the standards.

While CEC's proposed computer and monitor standard contains many good elements, more remains to be done to ensure projected savings materialize. As such, we are asking the Commission to do the following:

- **Minimize long-term exemptions and allowances.** When the second stage of the standards comes into effect four years after adoption, manufacturers will have had plenty of time to integrate these features into their typical designs in a way that requires no additional energy. Technology evolution has shown time and again that most new features don't require much, if any, additional energy once optimized and integrated into chips.
- **Include an "off-ramp" mechanism** for any exemption or allowance that is no longer warranted and develops into a major loophole. The CEC will monitor the market, and when pre-determined and clearly communicated conditions are met, initiate a rulemaking to adjust the standards to phase out exemptions and allowances within 12 months. This would give industry time to adjust while avoiding a major loss in savings due to growing loopholes.

The organizations signed onto this letter are very supportive of the role that appliance energy efficiency standards can play in helping California meet its ambitious climate goals. NRDC estimates that appliance energy efficiency standards can contribute more than 40 percent of the savings needed to hit SB 350's goal of doubling building efficiency savings by 2030. Appliance standards are by far the most cost-effective, consumer-friendly energy saving measure, and we recommend they be a more prominent tool in California's climate protection and economy-boosting policy portfolio. This starts by ensuring that the current computer and monitor standards are designed to actually deliver the promised savings.

Sincerely,

Joe Ridout
Consumer Action

Pierre Delforge
Natural Resources Defense Council

Shannon Baker-Branstetter
Consumers Union

Steve Frisch
Sierra Business Council

Mary Solecki
Environmental Entrepreneurs (E2)

Adrianna Quintero
Voces Verdes

Stephanie Chen
The Greenlining Institute