

BEFORE THE CALIFORNIA ENERGY COMMISSION

Development of the California Energy
Commission Investment Plan for the
Electric Program Investment Charge

Docket No. 12-EPIC-01
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**COMMENTS OF THE TECHNOLOGY NETWORK AND
THE INFORMATION TECHNOLOGY INDUSTRY COUNCIL REGARDING THE
PROPOSED 2012-2014 TRIENNIAL INVESTMENT PLAN FOR FUNDS
ADMINISTERED BY THE CALIFORNIA ENERGY COMMISSION FOR THE
ELECTRIC PROGRAM INVESTMENT CHARGE PROGRAM**

October 26, 2012 (corrected October 29, 2012)

The Technology Network, (“TechNet”) and the Information Technology Industry Council (“ITI”) respectfully submit these comments regarding the staff report of the 2012-2014 triennial investment program for the Electric Program Investment Charge (EPIC). TechNet represents California’s leading technology companies in sectors such as hardware, software, smart grid, clean energy generation and biotechnology. The ITIC represents many of the nation’s largest and most successful information technology companies.

S1.6 describes the growing plug loads associated with appliance energy use in homes and businesses, particularly among electronics, with research on the “integration of smart controls” and addressing “behavioral and other issues.” TechNet and ITI have been engaged with the Commission on appliance energy efficiency over the last year and reiterate their interest in working with the Commission on behalf of an approach that allows California’s technology sector to continue to lead in the development of new technologies.

Information technology systems enable huge savings, typically returning a savings of ten watts of energy for every watt invested, according to the American Council for an Energy Efficient Economy (ACEEE). The energy efficiency of computers, as measured in computational power per watt, has improved by more than 2.8 million percent over the last three decades. Further, the industry is undergoing rapid changes, as more efficient models of PCs replace much older models that were less efficient and as sales of tablets ramp up quickly. Tablet sales, for example, are projected to reach 119 million by 2014 – almost four times their level in 2011.

TechNet and ITI believe that improving the efficiency of overall systems offers the most promising strategy to realize the significant additional efficiency gains

required by the state's energy goals harnessing controls and data made available through the state's investment in smart meters.

With respect to products like computers shipped in volume to consumer markets, TechNet and ITI members already typically include built-in power management tools designed to reduce energy use. TechNet and ITI believe that behavioral research that benefits our understanding how consumer use patterns of these tools is needed to develop effective public policies in this area. Concerns have been raised that consumers may be disabling power management. This concern has not been validated, and TechNet and ITI believe that this issue should be explored and addressed in the Commission's behavioral studies. The recently implemented battery charger regulations should also help address plug loads and the report should account for projected savings related to the battery charger regulations.

Overall, TechNet and ITI believe that the most promising opportunities, and the focus of the Commission's research in this area, as made clear in the original staff draft, should be on the "integration of smart controls" and the "behavioral issues" (including the use of power management) to address the plug load issues. This clarity should be provided in the final Report, which lists a number of areas but does not offer as specific guidance on priorities.

TechNet and ITI look forward to continuing to engage with Commission staff to ensure that studies in this area develop the data necessary to formulate effective public policies.

Respectfully submitted,

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