



June 4, 2024

Ryan Fogle
Office of Air and Radiation
United States Environmental Protection Agency
1200 Pennsylvania Avenue, NW
Washington, D.C. 20460

Topic: ENERGY STAR® Computers Specification Version 9.0, Draft 2

Dear Mr. Fogle:

This letter comprises the comments of the Pacific Gas and Electric Company (PG&E), San Diego Gas and Electric (SDG&E), and Southern California Edison (SCE), collectively referred to herein as the California Investor-Owned Utilities (CA IOUs), in response to the United States (U.S.) Environmental Protection Agency (EPA) ENERGY STAR® Computers Specification Version 9.0, Draft 2.

The CA IOUs comprise some of the largest utility companies in the nation, serving over 32 million customers in the Western U.S. We are committed to helping customers reduce energy costs and consumption while striving to meet their evolving needs and expectations. Therefore, we advocate for standards that accurately reflect the climate and conditions of our respective service areas.

We appreciate the opportunity to provide comments on the second draft of the Computers Specification Version 9.0. The CA IOUs generally support draft 2 revisions, including the updated base allowances and adders. We respectfully submit the following recommendations to EPA:

1. EPA should continue to promote efficient power supplies to reduce computer energy use, particularly in active mode.

The CA IOUs support the continued reduction of computer energy use through the ENERGY STAR program. During recent specification revisions, we have encouraged EPA to adopt more stringent power supply efficiency requirements and add a low load point measurement to promote efficient power conversion in all computer operating modes. Most recently, we supported the EPA's proposal to require 80 PLUS Silver efficiency levels for 500 watts and below power supplies. In draft 2, EPA removed this requirement and focused on reducing the total energy consumption (TEC) limits. The CA IOUs agree that EPA's approach will reduce computer energy use in idle, sleep, and off modes. However, we disagree that reducing TEC levels is a complete substitution for improving power supply efficiency requirements. The 80 PLUS standard specifies minimum efficiency levels for 20, 50, and 100% load levels. These are generally higher than load levels associated with the idle, sleep, and off modes included in the TEC measurements. By requiring efficient power supplies, the EPA could enhance performance in active

mode, a factor not included in the TEC measurement. The CA IOUs urge EPA to continue mandating more efficient power supplies in future specification versions.

2. The CA IOUs recommend EPA collect data on active mode electricity consumption and incorporate active mode energy use considerations in future revisions.

During the “ENERGY STAR Computers Version 9.0 Draft 1 Specification” webinar, EPA indicated its use of short idle mode as a proxy for active mode based on past data showing that the difference in power consumption between these two modes is within 5%. Personal computers are integrating artificial intelligence (AI) applications like ChatGPT; which require intensive computational resources, resulting in higher power consumption during active mode. This increased power consumption in active mode could surpass short idle periods. Therefore, the energy use in short idle mode should not be used as a proxy for active mode energy use.

We urge EPA to work with stakeholders to gather data on active mode power consumption and consider including active mode in the next revision.

The CA IOUs appreciate the opportunity to provide these comments regarding Version 9.0, Draft 2 of the computers specification. We thank EPA for its consideration. We look forward to the next steps in the process.

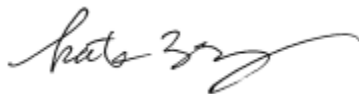
Sincerely,



Rob Bohn
Manager, Codes & Standards
Pacific Gas and Electric Company



Christopher Malotte
Sr. Manager, Codes and Standards
Southern California Edison



Kate Zeng
ETP/C&S/ZNE Manager
Customer Programs
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