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DOCKET
11-AAER-1
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September 30, 2011

California Energy Commission
Dockets Office, MS-4
Re: Docket No. 11-AAER-1
1516 Ninth Street
Sacramento, CA 95814-5512

Via Email (docket@energy.state.ca.us) & U.S. Mail

Subject: Comments of Sony Computer Entertainment LLC on 2009 Rulemaking Proceeding on Appliance Efficiency Regulations Phase II

Sony Computer Entertainment America LLC ("SCEA") appreciates the opportunity to provide the following comments on the 2009 Rulemaking Proceeding on Appliance Efficiency Regulations Phase II before the California Energy Commission ("CEC").

SCEA was founded in 1994. SCEA is based in Foster City, CA and serves as headquarters for all North American operations. Our company employs over 1,800 people predominately based in offices located in California. The PlayStation® brand continues to redefine interactive consumer entertainment with ground-breaking products, including the current PlayStation 3 game console.

SCEA is part of the Sony Group ("Sony") global family of companies, which collectively employs over 9,500 Californians. Sony recognizes the importance of preserving the natural environment that sustains all life on the earth for future generations. To realize a sustainable society, Sony strives to achieve a zero environmental footprint throughout the lifecycle of its products and business activities. For example, the Sony Group has worked diligently towards the reduction of power consumption, the promotion of resource conservation, the management of chemical substances and life-cycle assessments.

Accordingly, SCEA agrees with the CEC that reducing power usage is a worthy goal. We respectfully submit, however, that the regulation of game consoles is not the best way to achieve this goal for the reasons discussed below.

SCEA Is Committed To, and Has Voluntarily Achieved, Significant Energy Savings in Its Game Console

Since the launch of the PlayStation 3 game console in November 2006 to our most recent model, we have made a series of voluntary internal changes designed to increase energy efficiency. As a result, we have reduced power usage by over 64%.

Moreover, PlayStation has implemented an "auto power down" feature that is enabled "on" as the factory default mode. After periods of inactivity the game console will automatically power down.

Finally, the PlayStation 3 game console weight has been reduced 48.5% since introduction and overall packaging by 58.7%. This further demonstrates SCEA's overall commitment to reducing our environmental footprint.

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Game Consoles Should Not Be Added to the Scope of CEC's Regulatory Efforts Because They Are Different than other Appliances

Including game consoles in the CEC's current scope of regulatory efforts is not the best way to achieve energy savings because such consoles are unique and require a different approach.

There are only three major game consoles on the market – the PlayStation 3 (by SCEA), the Xbox 360 (by Microsoft) and the Wii (by Nintendo). These game consoles are sold as a “platform” instead of by model. This is unlike other consumer electronic hardware such as washing machines or computers. A typical gaming platform lifecycle may exceed 10 years. These devices are state of the art technology at launch with continuous improvements throughout the lifecycle, including reductions in power use.

Game consoles are an evolving technology. Each generation of consoles and video games incorporates new features, functions, and technology which are not yet commonplace and for which energy consumption requirements cannot be determined prospectively. Imposing power limits based on uses only known today may limit future innovation, to the detriment of consumers. With all of the voluntary improvements we have achieved, the energy efficiency of our game console has vastly improved. Further regulation would bring little additional benefit.

SCEA Is and Has Been Proactively Engaged with the other Game Console Makers and Others to Reduce Energy Use

Apart from our own ongoing efforts to reduce power consumption and achieve energy efficiency, SCEA is actively engaged with the other two major game console manufacturers, Microsoft and Nintendo. These voluntary efforts will result in more productive and achievable ways to obtain energy savings through approaches that would take into account our consumers' needs.

SCEA is actively working with other stakeholders, including the Natural Resources Defense Council (“NRDC”), to develop ideas and approaches to achieving energy use savings. For example, we have met with, shared information with and invited NRDC to share their suggestions and thoughts with us. They have done so and we believe the exchange has been positive and productive thus far.

SCEA Is Already Exploring a National and Tailored Approach for Game Consoles With the EPA and the Energy Star Program

SCEA, along with the other two major game console makers, continues to work with the EPA to determine if a voluntary, national approach can be achieved. Discussions thus far have acknowledged the fact that only three game console manufactures are in place today, and that a tailored and novel Energy Star recognition program could achieve better results than traditional approaches. The NRDC has been involved in this process.

Rather than regulate locally in California, SCEA encourages the CEC to allow the three major console makers to continue to explore a national strategy with the EPA. These efforts are well under way and should be allowed to reach a conclusion. A uniform approach would be more desirable and effective than state-by-state regulations that force the inclusion of game consoles with everyday electrical appliances.

* * *

SCEA has already made great strides -- voluntarily -- to achieve significant energy savings. Not content to rest on its achievements, SCEA continues its efforts by cooperating with the other major console makers, the federal government and groups such as the NRDC, to develop unique and effective voluntary standards and solutions. Regulations would be unnecessary and, in fact, counterproductive. Accordingly, we respectfully request that game consoles be excluded from the scope of the CEC's current efforts to regulate electronic appliances.

SCEA welcomes the opportunity for further dialogue with the CEC. Please let us know if CEC has any questions or would like to learn more about our voluntary and effective efforts.

Respectfully Submitted,

A handwritten signature in black ink that reads "Riley R. Russell". The signature is written in a cursive style with a large, prominent "R" at the beginning.

Riley R. Russell
Sr. VP and General Counsel