

Date: September 30, 2011

Subject: HP comments related to 11-AAER-1 2009 Rulemaking Proceeding on Appliance Efficiency Regulations Phase II

Dear CEC,

It appears that the CEC prioritization of product categories to regulate is largely based on the "Potential Electricity Savings from Future Title 20 Topics" bar graph that was part of the NRDC presentation. If this data is a primary input for prioritization, we have the following questions and concerns:

- 1) PCs. PCs represent the largest savings opportunity on the Potential Savings chart, however, we are concerned that Notebook PCs, which will be regulated as part of the Battery Charger Regulation, are also being counted in this PC savings. Notebooks PCs should be removed from this category, as we understand that the CEC does not intend to "double-regulate" Notebook PCs. With Notebook PCs removed, the PC Bar will be significantly smaller, likely less than half.
- 2) Servers, #5 category on the Potential Savings chart. We are concerned that the formula for energy savings of Servers was leveraged from PCs. If this is the case, we think the Potential savings from Servers is greatly overstated as Servers have a different operating profile. In general, Servers do not have an Idle or Powersave mode, which is the primary mode for aggregated PC operation. Servers are also highly configurable which greatly complicates the setting of energy limits. Finally, there are many distinct types of Servers, from standalone Servers in their own chassis, to blade servers in data center racks. If Servers are regulated, we request a specific definition for Servers.
- 3) Small Network Equipment, Digital Picture Frames and Imaging Equipment were on a CEC list of proposed categories to regulate, however they do not appear on the "Potential Electricity Savings" chart. If this chart is a primary source for prioritization, it appears that Small Network Equipment, Digital Picture Frames and Imaging Equipment should be out of scope of the regulation as we are not aware of how their potential savings stacks up to other categories.

Thanks for your consideration.

Regards,
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