



The Canadian Radio Television and Telecommunications Commission
Les Terrasses de la Chaudière
Central Building
1 Promenade du Portage
Gatineau, Quebec J8X 4B1

April 29, 2014

Submission by the Canadian Energy Efficiency Alliance (CEEA) with regard to: CRTC Notice of Consultation 2014-151

**Applications 2014-0026-7 Bell Expressvu Inc;
Mountain Cable Vision Ltd, Fido solutions Inc. in partnership with Rogers
Communications Application 2014-0022-5;
Shaw Pay per View application 2014-0087-9, 2014-0088-7;
Videotron and 9227-2590 Quebec Inc 2014-0044-9;
Bell ExpressVu and Bell Canada application 2014-0024-1;
Bell ExpressVu Inc and Bell Canada Application 2014-0024-1;
Bragg Communications Application 2013-1786-8;
Wrightman Telcom Application 2014-0080-4**

The Canadian Energy Efficiency Alliance (CEEA) is pleased to submit its comments on the above-noted requests for licence renewals of the pay-per-view systems attached to a number of Canada's most significant distribution undertakings.

CEEA is the independent advocate for energy efficiency in Canada. We work with governments and stakeholders to ensure energy efficiency is a priority for all sectors of the economy. We are an effective voice and resource for policy makers, businesses, builders, consumers, energy companies and environmental groups.

In April 2013 CEEA released a survey conducted by the Gandalf Group on the attitudes of Canadians toward energy efficiency - only 22% of Canadians felt they were actively engaged but the big finding was that a majority of Canadian consumers (more than 70%) - regardless of region, age, gender or income, intend to do more to conserve.

Set-top boxes, which are needed to deliver pay-per-view services to consumers, are a significant energy consumer in the homes of Canadians. While the Canadian government through departments like Natural Resources Canada, plus electrical utilities in every province, are working hard to educate Canadians on how to conserve energy – there are times when industry assistance is needed.

In December of 2013, the United States Department of Energy put out the following statement:

“Today, the U.S. Energy Department, the Natural Resources Defense Council (NRDC), the American Council for an Energy-Efficient Economy (ACEEE), the Appliance Standards Awareness Project (ASAP), the Consumer Electronics Association (CEA)[®] and the National Cable & Telecommunications Association (NCTA) announced non-regulatory energy efficiency standards for pay-TV set-top boxes that will result in significant energy savings for more than 90 million U.S. homes. These new standards – developed through a non-regulatory agreement between the pay-TV industry, the consumer electronics industry and energy efficiency advocates – will improve set-top box efficiency by 10 to 45 percent (depending on box type) by 2017, and are expected to save more than \$1 billion on consumer energy bills annually.

The set-top box efficiency standards announced today will ultimately save enough electricity each year to power 700,000 homes. The standards will also avoid more than five million metric tons of carbon dioxide emissions each year. As consumer demand for digital video recorders and high-definition set-top boxes grows, actual consumer savings are likely to be even greater. The introduction of whole-home devices will also further reduce the overall energy footprint.”

The Department of Natural Resources Canada has recently brought together many of the concerned parties in Canada to discuss this matter. However, while many of the distribution undertakings/licensees are present it is not clear that they are committed to this issue.

While the CRTC may at first see this matter outside their purview, this is in fact about the costs that Canadians are paying for these services.

Canadian distribution undertakings do not appear to offer programs that inform their consumers/clients of the energy efficient options that may be available to them - few consumers are offered ENERGY STAR[®] set top boxes; they are not told how to power down their equipment to avoid unnecessary payment for phantom power.

Global manufacturers have developed the equipment needed to address this matter. Distribution undertakings either working through CEEA or directly with local electrical utilities need to:

1. Educate their employees about promoting energy efficient set top boxes;
2. Ensure information is provided with utility bills; and



3. Include information friendly advice on this in their communications activities – both printed and in social media.

Canadians from sea-to-sea are becoming very concerned about their rising electricity bills – and when there are helpful answers they need to be provided.

CEEA is asking that the CRTC ask these licensees the following:

- Are you engaged in the process to discuss a voluntary code related to energy efficiency and set top boxes begun by Natural Resources Canada? If not, ask for a name that can be given to that Department:
- Do you make ENERGY STAR[®] set top boxes available to your customers? If not, why not?
- Do you provide any advice to your customers related to reducing electricity costs by using a set top box more efficiently and effectively?
- Would you be willing to work with groups like CEEA and/or local utilities to help consumers access programming services in a more energy efficient way?

And finally,

- If this group set-up by Natural Resources Canada is able to develop a voluntary Code – is the CRTC willing to ask licensees to report back to them on their progress on a regular basis? This information should be put on the public record so that all consumers can see it.

There will be those who will argue that our point may be outside the scope of these hearings. However, in the end, what consumers are paying to receive these services is key. Responsible distribution undertakings/programming services have tools within their power to limit the consumer burden. We are asking if they are willing to be responsible and we would like to have the CRTC's support.

We note that in the United States, the National Cable Television and Telecommunications Association has made information on this matter publicly available.

https://www.ncta.com/sites/prod/files/NCTA_Set-TopBoxEnergyEfficiency.pdf

An organization like the NCTA no longer exists in Canada yet we believe Canadians deserve the same amount of information and service. It should be noted that in the US where a voluntary agreement exists there is a requirement for public reporting of energy consumption products. It also includes an annual verification audit to be conducted on random signatories to ensure they are meeting their obligations under the Voluntary Agreement.



For Canadian programming and distribution undertakings, which must comply to a host of voluntary agreements and the CRTC, this should not be a new concept.

CEEA is happy to appear at any public hearing related to this process and expand on the potential ways that consumers can reduce their energy costs through the use of ENERGY STAR® set top boxes and applying good conservation habits.

Sincerely,

Elizabeth A. McDonald
President and CEO

Tel: 613-656-9705

Cell: 613-851-1330

elizabethmcdonald@energyefficiency.org