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Submitted via email

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**Re: Entertainment Software Association Comments on Changes to the Residential Energy Consumption Survey
Federal Register, Nov. 20, 2019, Vol. 84, No. 224**

The Entertainment Software Association (“ESA”) submits these comments in response to the Energy Information Administration’s (“EIA”) proposal to revise the Residential Energy Consumption Survey (“RECS”) published in the Federal Register on November 20, 2019 (Vol. 84, No. 224). ESA represents publishers of video games for computers, game consoles, and the internet as well as makers of game consoles. Our comments respond to EIA’s proposal to add a survey question on video game console usage in order to differentiate high, medium, and low usage households for these devices.

ESA appreciates the difficult task EIA faces in preparing a survey that collects meaningful and useful consumption data, balanced against the need to present questions to survey respondents that are not overly complicated or confusing. However, we also recognize that—unless worded properly—an overly broad question regarding video game console usage could confuse or mislead survey respondents, resulting in an inaccurate overstatement of the contribution of video game consoles to “miscellaneous electric load” consumption.

Therefore, ESA urges EIA to limit any survey question on game console usage to “active game play,” so that periods of lower energy consumption (*i.e.*, when the console is in standby mode or in a non-gaming function) are excluded.

1. Modern Game Consoles Employ Automatic Energy Efficiency Measures.

ESA members are proud to have taken meaningful strides to improve the energy efficiency of their products in the United States and globally.¹ Consistent with these successful national and international efforts, modern game consoles are not simply on/off devices. Rather, they employ automatic power-down and other energy saving features that take consoles into a standby or low power mode when the user is not actively engaged in game play. Importantly, automatic power-down modes are normally enabled in the default settings for game consoles.

When in standby mode, consoles consume significantly less power than active game play. For example, Sony PlayStation reports that tests for its PlayStation 4 Pro model (No. CUH-72XX) resulted in active game play usage of 146.4 watts (high definition) and 158.2 watts (ultra-high definition), and only 6.4 watts when the console was at “rest,” meaning the low power mode when connected to the internet and with the game application suspended.²

Many game consoles can also be used for other home entertainment functions, such as streaming services or to play DVDs. These uses also consume significantly less energy than when the console is in active game play.³

2. The RECS Question on Game Console Use Should Specifically Collect Data on Active Game Play.

To avoid survey results that overstate the time spent in the more energy intensive use of active game play, ESA suggests that any new question for game consoles clarify that respondents only provide estimated usage for “active game play.”

¹ ESA members Sony PlayStation, Xbox, and Nintendo have voluntarily agreed to the European Union’s Self-Regulatory Initiative, which has the objective of reducing the environmental impacts of game consoles, with a focus on energy efficient consumption for these devices. At the 2019 United Nations Climate Change Summit, Sony PlayStation announced that its next generation console will include the possibility to suspend gameplay with much lower power consumption than the current PlayStation 4 (estimated at around 0.5 watts), and Microsoft announced that it will produce 850,000 carbon-neutral Xbox consoles. The game console industry also provides consumers with tips to improve game console energy efficiency, and has worked with EPA’s Energy Star to publish consumer tips for energy efficiency settings for certain console models. (See “Configuring Today’s Game Consoles to Use Less Energy: Tips for Reducing Power Consumption,” available at https://www.energystar.gov/products/configuring_todays_game_consoles_use_less_energy_0#%22Energy-saving%22%20Power%20Mode.)

² Playstation provides energy consumption test results for its products for purposes of complying with the European Union Self-Regulatory Initiative for game consoles. (See <https://www.playstation.com/en-gb/legal/ecodesign/>).

³ In addition to PlayStation’s reported energy consumption test results, see also Microsoft’s reported energy consumption improvements for the Xbox, which indicate that energy consumption for media uses of the Xbox consoles are less than half of active game play: <https://www.microsoft.com/en-us/legal/compliance/energy>.

As explained above, video game consoles are not simply “in use” or “off” like other devices, and game consoles have media functions other than active game play that are less energy intensive. An oversimplified question that asks how many hours a game console is turned on or how many hours a consumer uses a game console could result in a respondent overestimating the collective time a game console is in active game play (as opposed to being in standby mode and/or streaming other media). A user may also have difficulty estimating periods that a game console is in a standby or low power mode, as that user is not actively engaged with the equipment during those periods.

To avoid survey results that overstate the time spent in the more energy intensive use of active game play, ESA proposes that EIA ask respondents to provide estimated usage only for “active game play.” For example, EIA might consider a question such as, “How many hours do you use your game console in active game play?,” making it more clear to respondents that they should not include in their responses time spent while the console is in a low wattage standby mode.

ESA appreciates this opportunity to provide comments for the development of the 2020 RECS. Please feel free to contact me with any further questions or requests.

Sincerely,

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EIA Response on April 22, 2020

Hi Chase,

Thanks for your interest in the 2020 RECS and the questions we are planning to include! As Chip mentioned, over the past few months we conducted extensive pretesting of potential new and revised questions, and one of our topical areas of focus was how people use televisions and peripherals including video game consoles. Consistent with the 2015 RECS our focus for the 2020 RECS will continue to be on producing a combined estimate for the end-use category of “TVs and peripherals” and for “TVs” specifically. Given limits on the length of the survey (roughly 30 minutes), we are limited on detailed questions about individual peripherals. Because of this limit, we aren’t likely to produce a specific consumption estimate for video game consoles. As a result of the pretesting, though, we plan to include this new question on the 2020 RECS questionnaire that should provide some insights into active video game console usage:

What is the main use of your [most used/second most used/third most used] television?

- 1 Watching live programming
- 2 Watching recorded or on-demand programming from a set-top box
- 3 Streaming content via built-in smart TV apps
- 4 Streaming content via a separate streaming device connected to the television
- 5 Playing video games
- 6 Other (please specify)

This will be part of the overall series about televisions. So we'll ask:

- Total number of TVs used
- For the first, second, and third TV used:
 - Display size
 - Display type
 - Main use of TV (new question shown above)
 - Hours per day of usage on weekdays (revised from previous categorical responses like “Less than 1 hour”, “1 to 3 hours” to instead collect numeric responses)
 - Hours per day of usage on weekends (similar to above)
- Counts of peripherals used (same list as in 2015, which includes “video game consoles”)

As compared to the information collected in prior RECS surveys, we'll now be able to identify which TVs are mainly used for gaming and potentially be able to compare gaming behavior on weekdays vs. weekends. The new question above also focuses on “playing video games” as opposed to using video game consoles for any purpose. Our pretesting revealed that respondents understand “playing video games” to mean using the console in active mode. We hope you'll agree our questionnaire changes are improvements.

If you have any further questions about our plans for the 2020 survey, please let myself or Chip know.

Best,

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