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CTA Comments to Title 20 RFI

Additional submitted attachment is included below.

BEFORE THE
CALIFORNIA ENERGY COMMISSION

In re RFI for Administrative Updates to the Title 20 Appliance Efficiency Regulations	Docket No. 25-AAER-01 TN #: 267824

RESPONSE OF
THE CONSUMER TECHNOLOGY ASSOCIATION

The Consumer Technology Association (CTA)® appreciates the opportunity to provide comments in response to the Commission's Request for Information (RFI) for Administrative Updates to the Title 20 Appliance Regulations.

CTA is North America's largest technology trade association, representing over 1,500 companies in the U.S. consumer technology industry, including manufacturers of televisions and displays subject to California's appliance efficiency regulations. Our members are the world's leading innovators – from startups to global brands – helping support more than 18 million American jobs. Our member companies have long been recognized for their commitment and leadership in innovation and energy efficiency, often taking measures to exceed regulatory requirements on environmental design and product stewardship.

CTA's responses to the Commission's specific questions are set forth below.

1. **The CEC should allow e-labelling for electronic products with a display or used with a display to streamline compliance to §1607 marking requirements.**

Section 1607(b) requires that manufacturers permanently, legibly, and conspicuously display the model number and date of manufacture on an accessible place of each device. CTA understands these marking requirements aid in enforcement and allow CEC to determine product compliance. However, permanently placing the model number on an accessible part of an electronic product may create unnecessary challenges for consumers and manufacturers. For this reason, CEC allows exceptions for certain product types, including plumbing fittings, sprinkler bodies, and fluorescent lamp ballasts. CTA believes electronic labeling should also be allowed for those electronic products that could support it, in particular because, for a single chassis design, the definition of Basic Model of a Computer in Section 1602 might create dozens or hundreds of different configurations.

First, for consumers and particularly IT infrastructure administrators, requiring that these types of products place physical markings on the unit provides no means for these individuals to verify compliance or to look up these products in the CEC's database short of physically inspecting the unit for the physical model number. Since IT administrators for large corporations or public entities (i.e. universities and hospitals) are most likely to benefit from significant energy efficiency improvements of their computers, the regulations should be tailored to support their efforts to reduce energy, where feasible. This issue extends to other electronic products, including displays, battery chargers, and ancillary components such as headphones, mice, keyboards, portable speakers, all of which may be refurbished products.

Next, physical markings introduce needless complexity in the factory. If a manufacturer must upgrade a product's motherboard, package a product with a different power supply, make a modification to fix a quality assurance failure discovered at the end of the production line, or make another similar change, the physical marking requirements require the manufacturer to alter the model number and/or date of manufacture permanently displayed on the unit.[1] Issues can also occur if a computer fails quality assurance steps at the end of the line, requiring a new date of manufacture. Any change in the physical markings required on the product then necessarily requires the manufacturer to dispose of the part bearing the markings being replaced, which generates waste. While some manufacturers might choose to use adhesive labels that may be removed from the enclosure, such labels are difficult to separate from the physical enclosure for recycling at end-of-life. This leaves manufacturers with no perfect solution to ensure compliance obligations have minimal administrative and operational burdens.

While physical labels add challenges, electronic labels reduce them. When it is necessary to check the model number or manufacture date of a product connected to a network, it is much easier for the person doing the checking to query the product electronically, particularly if the product is in a remote location, or if there are numerous products that need to be checked.

Proposed Solution and Language

To resolve the aforementioned challenges and to better serve the purpose of the regulations, [2] CTA proposes the CEC adopt an additional exception for marking requirements under 1607(c) which would allow for electronic markings for electronic products. CTA proposes the following wording for the exception:

> *"(4) For products featuring a built-in display, products intended to be used with an external display, products intended to be controlled or used with*

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[1] "Basic model" of a computer is defined in § 1602 as "a computer means a group of computer models that are made by a single manufacturer and that have the same chassis, power supply, motherboard, and expandability score. The chassis shall be considered the same if the energy use characteristics are not modified by variations in the chassis, such as a change in color."

[2] "to reduce the inefficient consumption of energy and water" . CA Pub Res Code § 25402(c) (2021)

products featuring a built-in display, or products intended to be controlled or used with products using an external display, 'displayed on an accessible place on each unit' shall include being displayed electronically using a built-in display or, for products without a built-in display, an external display typically used in connection with the product in a location readily locatable by a layperson. This section shall be construed to apply to all forms of computers, computer displays, and products capable of having model and manufacture date information displayed on associated computers or computer displays. On request, a manufacturer displaying information electronically shall provide the means to access the information to the Energy Commission."

In detail, here are the four relevant portions of the proposed language:

A. This language would permit digital labelling for the following:
   (1) Products featuring a built-in display—for example laptops;
   (2) Products intended to be used with an external display—for example desktop computers; and
   (3) Products intended to be controlled or used with products featuring a built-in display or products intended to be used with an external display—for example headphones, mice, and keyboards,
B. The exception would allow physical labelling as well as digital labelling to be used:
   (i) on a built-in display, for products with an actual built-in display—for products like laptops or displays; or
   (ii) on an external display typically used in connection with the product—for products like desktops, mice, keyboards or headphones.
C. The language also explicitly clarifies that the text is intended to apply to computers and computer displays, a helpful clarification particularly for (a) products which are controlled remotely (workstations) and may not actually ever be connected to a display while in use, and (b) products which are actually defined as displays in the regulations for which the words 'built-in display' may be interpreted as not being included.
D. Finally, the language adds a requirement that the "means to access the information" be made available to the Energy Commission upon request – a necessary clause to facilitate enforcement in cases where the products are accessory hardware products that are intended to be used with or controlled by products with built-in display or products intended to be used with an external display and the location of the model number may not always be self-evident.

2. CTA Proposes to Eliminate Duplicative Battery Charger Reporting Requirements

Federal Regulation Is Comprehensive and Adequate
Battery chargers are comprehensively regulated at the federal level under 10 C.F.R. § 430, Subpart B, Appendix Y. California has not adopted separate, more stringent state-level standards for battery chargers. Instead, California defers to and enforces the federal standards for these products. Under federal law, manufacturers of battery chargers must certify their products in DOE's Compliance Certification Management System (CCMS) database. This federal database serves the identical compliance verification function that MAEDbS serves for state-regulated appliances: it allows retailers and enforcement agencies to confirm which products meet applicable efficiency standards.

Duplicative State Reporting Serves No Purpose
Currently, Section 1606 requires manufacturers to also certify federally regulated battery chargers in MAEDbS, despite the fact that:

1. No separate California standard exists - California enforces the federal standard, not a distinct state requirement
2. Federal certification already occurred - Products are already certified in the DOE CCMS database
3. Federal database is publicly accessible - Retailers and enforcement agencies can verify compliance through CCMS
4. No additional compliance information is captured - MAEDbS entries for battery chargers simply duplicate information already in CCMS

This duplicative reporting requirement serves no clear regulatory purpose. It does not enhance compliance verification, does not provide consumers with additional information, and does not assist the CEC in enforcement when the federal database already serves these functions.

The Burden of Dual Certification
Requiring manufacturers to certify the same products in two separate databases creates unnecessary administrative burden:

- Doubled data entry effort - Technical specifications must be entered into two separate systems
- Increased opportunity for errors - Maintaining consistency across dual entries increases administrative complexity
- Delayed market access - Additional certification steps delay product availability to California consumers
- Compliance tracking complexity - Manufacturers must monitor compliance status in two separate systems

- Update management burden - Any product modifications require coordinated updates in both databases

These burdens are particularly acute for manufacturers with extensive battery charger product lines, where hundreds or thousands of models may require dual certification.

California Has No Enforcement Need for Duplicate Data

The CEC's enforcement authority for federally regulated battery chargers derives from federal standards, not separate state standards. The CEC can verify compliance by referencing the DOE CCMS database - the authoritative source for federal compliance determinations.

Maintaining duplicate data in MAEDbS provides no enforcement advantage:

- CEC must ultimately rely on federal standards - California has not adopted different performance requirements
- DOE CCMS is the authoritative compliance record - Federal certification determines product eligibility for sale
- CEC can coordinate with DOE on enforcement - Interstate enforcement cooperation does not require duplicate databases
- Retailers can verify compliance through CCMS - The primary MAEDbS user can access federal data directly

Precedent for Eliminating Duplicative Requirements

The CEC has previously recognized that duplicative reporting requirements should be eliminated when they serve no distinct purpose. This administrative update proceeding provides the appropriate opportunity to extend this principle to federally regulated battery chargers.

Eliminating the MAEDbS certification requirement for federally regulated battery chargers aligns with the RFI's stated goals:

- Streamlining code provisions while having the same overall effect
- Removing areas where provisions are obsolete or in need of improvement
- Reducing unnecessary regulatory burden

Proposed Language:

CTA requests that Section 1606 be amended to exclude federally regulated battery chargers from the MAEDbS certification requirement, with language such as:

"Manufacturers are not required to certify in MAEDbS those battery chargers that are subject to federal energy conservation standards under 10 C.F.R. § 430, Subpart B, Appendix Y and for which no separate California standard has been adopted,

provided such battery chargers are certified in the U.S. Department of Energy Compliance Certification Management System."

This change would:

- Eliminate duplicative reporting burden
- Maintain full compliance verification capability through the federal database
- Preserve CEC enforcement authority
- Improve regulatory efficiency without compromising consumer protection

3. **CTA requests that the CEC remove the 48 data points derived from Annex B of the DOE test procedure for televisions from Section 1606, Table X from the Modernized Appliance Efficiency Database System (MAEDbS).**

The RFI explicitly notes that "staff are planning to address a request to streamline data reporting for televisions that was received earlier this calendar year." CTA submitted comprehensive comments on June 27, 2025, in Docket No. 24-AAER-01 (TN #262997) requesting the removal of unnecessary data fields from the Modernized Appliance Efficiency Database System (MAEDbS). We incorporate those prior comments by reference and urge the CEC to implement the requested revisions as part of this administrative rulemaking.

Summary of Request

CTA commends the CEC for conducting this biennial administrative review and specifically for identifying television data reporting as an area warranting streamlining. CTA would like to reiterate our previous request that the CEC remove the 48 data points derived from Annex B of the DOE test procedure from Section 1606, Table X. We submitted comprehensive comments on this subject previously on June 27, 2025, in Docket No. 24-AAER-01 (TN #262997) requesting the removal of unnecessary data fields from the Modernized Appliance Efficiency Database System (MAEDbS). The RFI explicitly notes that "staff are planning to address a request to streamline data reporting for televisions that was received earlier this calendar year." These data points, which report television performance under highly specific laboratory conditions, serve no compliance verification purpose, create unnecessary burdens on manufacturers, and undermine the core purpose of MAEDbS. Specifically, CTA requests public deletion of the following categories of data fields that currently require reporting of performance measurements under specific test conditions:

1. Default SDR Preset Picture Setting (PPS) fields:
    - Performance data with ABC enabled/disabled at various backlight levels
    - Power consumption and luminance at approximately 4, 17, 50, and 140 lux ambient light levels

2. Brightest SDR PPS fields:
    - Performance data with ABC enabled/disabled at various backlight levels
    - Power consumption and luminance at approximately 4, 17, 50, and 140 lux ambient light levels
3. Default HDR PPS fields:
    - Performance data with ABC enabled/disabled at various backlight levels
    - Power consumption and luminance at approximately 4, 17, 50, and 140 lux ambient light levels

These 18 categories encompass 48 unique data points in MAEDbS—none of which are necessary to demonstrate compliance with California's efficiency standards.

While advocates such as Pacific Crest Labs LLC, ACEEE, and the California Investor Owned Utilities have expressed their desire to keep these fields in their responses to CEC's Request for Information – Revised Data Collection Requirements for Televisions and Displays, they fail to cite reasoning that keeping the data fields serves the public interest. It appears the only reason they want to keep these data fields is so they can use them for personal reasons and make their own conclusions on what the data means and how it should be used for policy development.

The Purpose of MAEDbS: Compliance Verification, Not Policy Development

The fundamental purpose of MAEDbS is straightforward: to enable retailers to confirm which televisions comply with the CEC's minimum efficiency standards. These 18 categories (Annex B) which we are requesting be eliminated, encompass 48 unique data points in MAEDbS—none of which are necessary to demonstrate compliance with California's efficiency standards. The inclusion of Annex B data sabotages this purpose by cluttering the database with hyper-technical information that is irrelevant to determining whether a television complies with California law. The test method already provides the compliance metric.

The DOE test method aggregates the 48 individual Annex B data points into a single metric: Average On Mode Power (watts). This aggregated value is the meaningful compliance metric and is already reported in MAEDbS. The individual data points from which this average is calculated provide no additional compliance information—they merely show the intermediate steps in a calculation that has already been completed. Requiring manufacturers to report both the aggregated compliance value AND all 48 individual test condition measurements is analogous to requiring students to show their work even after the correct answer has been verified. In a compliance database, only the answer matters.

DOE Deliberately Excluded This Information from Public Reporting

Significantly, DOE excluded Annex B information from its test reporting requirements. The federal test method requires manufacturers to maintain this granular testing data but does not require public reporting of these 48 data points. California's decision to require public reporting of information that DOE deliberately excluded creates an unnecessary divergence from federal requirements and imposes additional burdens on manufacturers without justification.

Advocates' Desired Use of Data Falls Outside MAEDbS's Purpose

In previous proceedings, advocacy groups such as Pacific Crest Labs LLC, ACEEE, and the California Investor Owned Utilities opposed CTA's position by arguing they would like access to this granular data for their own review and to inform potential future advocacy efforts. However, the function of MAEDbS is not to provide raw data for third-party policy development. MAEDbS exists to verify compliance—full stop.

If advocacy groups or researchers desire access to granular testing data for policy analysis purposes, the appropriate mechanism is to:

1. Request such information directly from manufacturers
2. Petition the CEC to collect such information confidentially for staff analysis
3. Conduct independent testing
4. Request information through formal rulemaking proceedings when standards updates are under consideration

The CEC should not burden manufacturers with public disclosure requirements merely to satisfy third parties' research interests when those interests are disconnected from the database's compliance verification purpose. These 48 data points provide no consumer benefit.

Consumers Do Not Use This Information

The 48 individual data points describe television performance under very specific laboratory conditions that do not reflect how televisions actually perform in consumers' homes. Each data point reflects conditions that only a small fraction of consumers will experience:

- Ambient light levels: To know whether their viewing environment has 4, 17, 50, or 140 lux of ambient light, consumers would need specialized light-measuring equipment

- Specific backlight settings: Consumers would need to determine whether their chosen picture setting is the "default," "brightest," or falls at specific points on the backlight adjustment scale
- ABC status: Consumers would need to know whether automatic brightness control is enabled and understand how it affects measurements

No reasonable consumer will use 48 data points of laboratory measurements to inform their purchasing decision. Even advocates who opposed CTA's previous petition acknowledged that consumers would not use this information for purchasing decisions. The data is simply too technical and too disconnected from real-world viewing experiences to provide actionable consumer information.

The Aggregated Value Is Sufficient and Meaningful

In contrast, the Average On Mode Power value provides consumers with a single, comprehensible metric that represents expected performance across all typical viewing conditions. This aggregated value is already available in MAEDbS and serves any consumer the legitimate information needed.

Public Disclosure Creates Competitive Harm

When developing new television models, manufacturers test products using the exact measurements captured in these 48 data points to optimize performance, energy efficiency, and picture quality. The television manufacturing industry is intensely competitive, and leading manufacturers invest millions of dollars developing innovative products.

Public availability of this granular performance library for every model could enable competitors to reverse engineer rivals' picture performance that required substantial investment to achieve. While manufacturers may test competitors' products independently, doing so requires significant resources and effort. The CEC should not force manufacturers to reveal detailed engineering data about every single model and make such information effortlessly available to competitors—especially when doing so serves no consumer or compliance benefit.

No Mechanism Exists to Protect This Information**:** Unlike other regulatory contexts where confidential business information can be submitted under protective procedures, MAEDbS makes all reported data publicly available. Manufacturers have no option to protect competitively sensitive data while still satisfying their compliance obligations.

If CEC continues to believe that the reporting of this data is necessary, we request that it be removed from the public database.

The CEC should not require public disclosure of potentially trade secret information when such disclosure serves no regulatory purpose.

Response to RFI Questions

Question 1: Is there any outdated or duplicative information in the regulations?

Yes. CTA has identified two significant areas of duplication.

1. Battery Chargers: The requirement to certify federally regulated battery chargers in MAEDbS duplicates federal certification requirements in the DOE CCMS database. When California has not adopted separate state standards and instead enforces federal standards, requiring dual certification serves no regulatory purpose and creates unnecessary manufacturer burden.

2. Television Annex B Data: The 48 Annex B data points in Section 1606, Table X are duplicative. These individual measurements are components used to calculate Average On Mode Power—a value that is separately reported. Requiring both the individual components and the calculated result serves no additional compliance purpose.

Question 2: Is there any requirement or text that is currently unclear as written?

While the data field requirements themselves are technically clear, their purpose and utility are fundamentally unclear given that they duplicate the compliance determination already captured in the Average On Mode Power field. The regulations would benefit from clarity that data reporting requirements should be limited to information necessary for compliance verification.

Question 3: Does any other set of regulations contradict or create issues regarding compliance with the Title 20 Appliance Efficiency Regulations?

Yes. CTA has identified two areas of conflict or unnecessary divergence:

1. Battery Chargers: Federal regulations already require comprehensive certification in the DOE CCMS database. California's additional requirement to certify in MAEDbS creates duplicative compliance obligations when California has not adopted distinct state standards. This dual certification requirement contradicts principles of regulatory efficiency and creates unnecessary burden without corresponding benefit.

2. Televisions: California's requirement to publicly report Annex B information conflicts with federal practice. DOE's test method at 10 C.F.R. Part 430, Subpart B, Appendix H deliberately excludes Annex B information from public reporting requirements, requiring only the aggregated Average On Mode Power value. This creates unnecessary divergence between state and federal requirements and imposes duplicative burdens on manufacturers who must maintain separate reporting protocols for California.

Question 4: Are there any typographical errors, formatting issues, or other readability issues?

Yes. In Section 1606, Table X, "fluorescent" is misspelled as "flourescent" in the LCD display technology type field.

The Information Collected Exceeds Administrative Needs

More Than Adequate Data Already Collected

The CEC adopted the current data reporting requirements in 2024. **Manufacturers have now reported more than one full year of data** under these requirements. If the CEC has any legitimate need for this granular information to inform future policy decisions, it already possesses an adequate dataset for such purposes.

Alternative Mechanisms Exist for Policy Analysis

If the CEC determines in the future that granular testing data would assist in evaluating potential standards updates, appropriate mechanisms exist to obtain such information:

1. **Confidential data requests:** The CEC can request manufacturers submit detailed technical data confidentially
2. **Stakeholder workshops:** The CEC can solicit technical information through formal rulemaking proceedings
3. **Targeted information requests:** The CEC can issue RFIs seeking specific technical information when standards updates are under consideration

None of these legitimate policy development needs justify ongoing public disclosure of 48 data points for every television model in perpetuity.

Proposed Regulatory Language

CTA proposes the following amendments to 20 CCR § 1606, Table X, Section V (Televisions) in the attached Appendix A.

Conclusion

The administrative rulemaking provides an ideal opportunity to correct the regulatory overreach represented by the Annex B data reporting requirements. The changes CTA requests are squarely within the scope of an administrative revision:

- **Elimination of duplicative information** - The 48 data points duplicate the compliance determination already captured in Average On Mode Power
- **Streamlining without changing standards** - Removing these fields does not alter performance standards or compliance requirements

- **Alignment with federal requirements** - The change brings California into alignment with DOE's deliberate exclusion of Annex B from public reporting
- **Clarity improvement** - Focusing on essential compliance data improves the utility and navigability of MAEDbS

The requested changes do not:

- Alter any performance standard
- Change any compliance requirement
- Reduce the CEC's ability to verify compliance
- Eliminate any consumer-useful information

The purpose of MAEDbS is to verify compliance, not to serve as a research repository for policy advocates. The 48 Annex B data points serve no compliance purpose, provide no consumer benefit, create competitive harm, and undermine the database's core function.

For the reasons detailed above and in CTA's June 27, 2025 comments (incorporated by reference), the CEC should remove the unnecessary and harmful requirement to report Annex B information from Section 1606, Table X.

CTA appreciates the CEC's consideration of these comments and stands ready to provide any additional information or clarification.

Respectfully submitted,

CONSUMER TECHNOLOGY ASSOCIATION

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Appendix A: Amendments to 20 CCR § 1606

Proposed Regulatory Language

A. Battery Chargers (Section 1606)

CTA proposes adding the following exemption to Section 1606:

ADD new subsection:

"(X) Manufacturers are not required to file in the Modernized Appliance Efficiency Database System for battery chargers that are subject to federal energy conservation standards under 10 C.F.R. § 430, Subpart B, Appendix Y and for which no separate California standard has been adopted, provided such battery chargers are properly certified in the U.S. Department of Energy Compliance Certification Management System (CCMS) database in accordance with federal requirements."

Rationale: This language:

- Eliminates duplicative certification burden for federally regulated products
- Maintains compliance verification capability through the authoritative federal database
- Preserves CEC enforcement authority by reference to DOE CCMS
- Applies only when California has not adopted separate state standards
- Ensures federal certification requirements are met

B. Televisions (Section 1606, Table X)

CTA proposes the following amendments to 20 CCR § 1606, Table X, Section V (Televisions), shown with deletions in strikethrough:

DELETE the following data fields:

~~Default SDR PPS: If ABC Enabled by Default, On Mode Power (watts) at the Default Backlight Level with ABC Off~~

~~Default SDR PPS: If ABC Enabled by Default, Dynamic Luminance (cd/m2) at the Default Backlight Level with ABC Off~~

~~Default SDR PPS: If ABC Enabled by Default, On Mode Power (watts) at Approximately 4, 17, 50, and 140 lux Ambient Light with ABC On~~

~~Default SDR PPS: If ABC Enabled by Default, Dynamic Luminance (cd/m2) at Approximately 4, 17, 50, and 140 lux Ambient Light with ABC On~~

~~Default SDR PPS: If ABC Not Enabled by Default, On Mode Power (watts) at Default Backlight Level, Minimum Backlight Level, and Approximately Halfway Between Minimum and Default Level with ABC Off~~

~~Default SDR PPS: If ABC Not Enabled by Default, Dynamic Luminance (cd/m2) at Default Backlight Level, Minimum Backlight Level, and Approximately Halfway Between Minimum and Default Level with ABC Off~~

~~Brightest SDR PPS: If ABC Enabled by Default, On Mode Power (watts) at the Default Backlight Level with ABC Off~~

~~Brightest SDR PPS: If ABC Enabled by Default, Dynamic Luminance (cd/m2) at the Default Backlight Level with ABC Off~~

~~Brightest SDR PPS: If ABC Enabled by Default, On Mode Power (watts) at Approximately 4, 17, 50, and 140 lux Ambient Light with ABC On~~

~~Brightest SDR PPS: If ABC Enabled by Default, Dynamic Luminance (cd/m2) at Approximately 4, 17, 50, and 140 lux Ambient Light with ABC On~~

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~~Default HDR PPS: If ABC Not Enabled by Default, Dynamic Luminance (cd/m2) at Default Backlight Level, Minimum Backlight Level, and Approximately Halfway Between Minimum and Default Level with ABC Off~~

RETAIN the following essential compliance fields:

- Display Technology Type
- Viewable Screen Area (total square inches)
- Screen Size (diagonal inches)
- Screen Resolution (horizontal and vertical pixel count)
- Power Consumption in Standby Mode (watts)
- **Average On Mode Power (watts)** ← This is the compliance metric

This approach aligns California's reporting requirements with DOE's federal test method, eliminates unnecessary manufacturer burden, and preserves all information necessary for compliance verification.

Additional Fields of Lesser Concern

CTA's June 2025 comments indicated that certain feature-related fields are **not commercially sensitive** and could be retained if stakeholders provide compelling public interest justifications. These fields include:

- High Dynamic Range 10 (HDR10) Capable
- Automatic Brightness Control (ABC) Capable
- Quick Start Capable
- Quick Start Enabled by Default
- Internet Connection Capable
- Smart Wake Capable
- Default SDR PPS: ABC Enabled by Default
- Brightest SDR PPS: ABC Enabled by Default
- Default HDR PPS: ABC Enabled by Default

However, **if no compelling public interest justification is provided by other stakeholders,** these fields should also be eliminated to avoid unnecessary reporting burden. The CEC should apply the principle that data should only be required when it serves a clear compliance verification or consumer information purpose.

The "Type of Standby Mode Tested" field is also not commercially sensitive and its retention or removal is of lesser concern to CTA's members.