

DOCKETED

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Comment Received From: Kevin Messner

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AHAM CTA Comments Supporting the Battery Charger Systems Rulemaking

Additional submitted attachment is included below.

California Energy Commission
Docket Unit, MS-4
1516 Ninth Street
Sacramento, CA 95814-5076

Re: Docket No. 18-AAER-02 for Portable Electric Spas and Battery Charger Systems
Appliance Efficiency Rulemaking

Dear Commissioner McAllister:

The Association of Home Appliance Manufacturers (AHAM) and the Consumer Technology Association (CTA) would like to comment on the *Portable Electric Spas and Battery Charger Systems Appliance Efficiency Rulemaking* (Docket 18-AAER-02). We represent companies that manufacturer battery chargers and products which use them, and we support the rulemaking's purpose to modify existing marking requirements in the appliance efficiency regulations for battery chargers.

We support CEC's efforts to align California's marking requirement for battery chargers with federal regulations, which do not include a marking requirement. This action would facilitate common requirements across the US, which will reduce consumer and market confusion and improve the effectiveness of minimum energy efficiency standards. We agree with CEC's assessment that if the California "BC" marking on products were to be left unaddressed, manufacturers would either have to make a product specifically marked for sale in California, or all products sold nationwide would have to have a mark, even though the requirement only applies in California. This would also add unnecessary product development costs. The proposed regulations appropriately addresses this problem by removing the marking requirement for federally regulated battery chargers.

We appreciate the opportunity to comment in support of this proposal as it relates to battery chargers.

Sincerely,



Kevin Messner
Sr. VP, Policy & Govt. Relations
AHAM



Doug Johnson
Vice President, Technology Policy
CTA

AHAM represents manufacturers of major, portable and floor care home appliances, and suppliers to the industry. AHAM's membership includes over 150 companies throughout the world. In the U.S., AHAM members employ tens of thousands of people and produce more than 95% of the household appliances shipped for sale. The factory shipment value of these products is more than \$30 billion annually. The home appliance industry, through its products and innovation, is essential to U.S. consumer lifestyle, health, safety and convenience. Through its technology, employees and productivity, the industry contributes significantly to U.S. jobs and economic security. Home appliances also are a success story in terms of energy efficiency and environmental protection. New appliances often represent the most effective choice a consumer can make to reduce home energy use and costs. Specific to this pre-rulemaking proposal, AHAM represents commercial clothes dryers that are manufactured on a similar platform as residential clothes dryers and are used in generally by the occupants of more than one household, such as multi-family housing common areas and coin laundries.

Consumer Technology Association (CTA)TM is the trade association representing the \$351 billion U.S. consumer technology industry, which supports more than 15 million U.S. jobs. More than 2,200 companies - 80 percent are small businesses and startups; others are among the world's best known brands - enjoy the benefits of CTA membership including policy advocacy, market research, technical education, industry promotion, standards development and the fostering of business and strategic relationships. CTA also owns and produces CES[®] - the world's gathering place for all who thrive on the business of consumer technologies. Profits from CES are reinvested into CTA's industry services.