



November 2, 2009

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09-AAER-1C	
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Art Rosenfeld, Commissioner, Presiding Member
Julia Levin, Commissioner, Associate Member
Karen Douglas, Commissioner, Chairman,
James Boyd, Commissioner, Vice-Chair
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512

Re: Docket No. 09-AAER-1C, Appliance Efficiency Regulations pertaining to
Televisions

Dear Commissioners:

Pursuant to the Notice of Public Hearing Re: Amendments of the Appliance Efficiency Standards (Docket No. 09-AAER-1C), we are pleased to submit these comments in support of the draft appliance efficiency standards for televisions in the active mode as possible amendments to the Appliance Efficiency Regulations of the California Energy Commission.

3M is an international, science-based company with worldwide sales in 2008 of \$25.3 Billion. In 2005, 2006, 2007 and 2008, 3M was recognized by the U.S. Environmental Protection Agency and U. S. Department of Energy, winning the Sustained Excellence Award for Energy Management in recognition of continuous improvement in energy management

3M manufactures over 60 000 different products in diverse markets from healthcare, renewable energy, highway safety to energy-saving Vikuiti™ optical films for LCD devices, including televisions, monitors, notebooks and handheld devices. In 2009, 3M received the Alliance to Save Energy Innovation Award for the energy saving benefits of our Vikuiti™ film in LCD televisions and monitors. 3M develops and manufactures Vikuiti™ optical films domestically and ship them overseas to be converted to the appropriate part size. This makes 3M the only large, US-made component supplier to the global \$80 billion LCD TV industry.

As indicated in earlier submissions, 3M Vikuiti™ optical film is integrated into the backlight of flat panel LCD televisions, 3M film alone can reduce their power consumption by up to 32%. This reduction in power allows manufacturers to use fewer bulbs and inverters, as well as to use smaller power supply units.

Using 3M optical film in combination with other energy efficient technologies, such as energy efficient lamps, can result in even greater power reduction. The incremental costs are offset through component reduction as a result of a more energy efficient television.

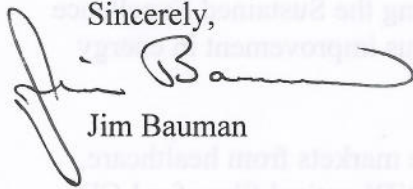
We support the Staff Draft Report, released in September 2009, which proposes that the Commission adopt television standards that include two tiers of efficiency standards for active mode.

As demonstrated during the Oct 13th workshop, there is a very broad range of energy efficient, commercially available televisions that positively exceed Tier 1 and Tier 2. However, consumers cannot easily find information on TV energy efficiency. Given the large volume of energy efficient televisions already commercially available, we strongly support the CEC proposal that power consumption and the brightness at which the power is measured, be readily available to consumers – both through accompanying documentation and at point of sale. This will ensure that consumers can consider energy efficiency performance along with other performance criteria when buying a new TV.

We look forward to talking to you and other stakeholders on this key topic.

Thank you for the opportunity to submit these comments.

Sincerely,



Jim Bauman