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July 1, 2008

Ms. Jackalyne Pfannenstiel
Chair

Mr. Arthur Rosenfeld
Commissioner

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

DOCKET	
09-AAER-1C	
DATE	JUL 01 2008
RECD	NOV 16 2009

Subject: **2008 Rulemaking on Appliance Efficiency Regulations;
Docket No. 07-AAER-03; Televisions**

Dear Ms. Pfannenstiel and Mr. Rosenfeld:

The Consumer Electronics Association (CEA) respectfully submits the following alternative to Pacific Gas and Electric Company's (PG&E's) proposal to set energy use limits for televisions. Our proposal affords the California Energy Commission, manufacturers, and retailers an ideal opportunity to work collaboratively to reduce energy consumption for televisions. We believe our proposal, combined with industry's ongoing participation in the Environmental Protection Agency's (EPA's) internationally-recognized ENERGY STAR program, and our members' continued dedication to energy efficiency improvements, is the most effective path to address and support energy efficiency for televisions.

CEA's proposal would (1) allow the Commission to collect comprehensive and accurate data on the power consumption of all televisions sold in the state; (2) inform consumers about television energy usage; and (3) promote consumer awareness of the EPA's newly revised and expanded ENERGY STAR program for televisions, particularly during key sales periods, through the transition to digital television broadcasting early next year. CEA's proposal is as follows:

Part 1

Mandatory Reporting of Energy Use Data: CEA suggests that the Commission amend Title 20 of the California Code of Regulations such that, effective February 17, 2009, any manufacturer intending to sell a digital television in the state must submit an energy use declaration for each model prior to sale. The declaration would include the model numbers of all televisions, the type of display technology employed (e.g., LCD, Plasma, CRT, Rear Projection), along with the active mode power consumption of the model(s) as calculated pursuant to IEC 62087, Edition 2.0. This mandatory reporting requirement would allow the Commission to better monitor and evaluate consumption and efficiency trends for televisions. It also would allow the Commission to review direct evidence that

