



January 19, 2009

Ms. Jackalyne Pfannenstiel
Chairman and Presiding Member, Efficiency Committee

Mr. Arthur Rosenfeld
Commissioner and Associate Member, Efficiency Committee

California Energy Commission
Buildings and Appliances Office
1516 Ninth Street, MS-25
Sacramento, CA 95814-5512

DOCKET	
09-AAER-1C	
DATE	<u>JAN 19 2009</u>
RECD.	<u>NOV 16 2009</u>

SUBJECT: THE LCD TV ASSOCIATION SUPPORTS THE TIER 1 AND TIER 2 TELEVISION ENERGY STANDARDS PROPOSED BY THE CALIFORNIA ENERGY COMMISSION;

RE: 2008 RULEMAKING ON APPLIANCE EFFICIENCY REGULATIONS;
DOCKET NO. 07-AAER-3-C; TELEVISIONS

Dear Ms. Pfannenstiel and Mr. Rosenfeld:

The LCD TV Association, a global, not-for-profit, marketing trade association formed to help the entire LCD supply chain, retail channel and consumers, endorses the two-tiered television energy standards contained within the December 2008 CEC Staff Draft Report. We believe California is taking a necessary and important step by leading the nation and world in promoting the most energy efficient televisions.

Given today’s significant energy and climate challenges, we are supportive of the California strategy to increase energy efficiency in TVs and want to work with the whole supply chain to help achieve that goal. Fortunately, great TV efficiency advancements have been made in recent years without sacrificing consumer choice or TV functionality. This innovation is occurring for both LCD and plasma flat-panel technologies, as was evidenced at the recent Consumer Electronics Show in Las Vegas (January 8-11, 2009) where virtually all the major TV manufacturers were prominently showcasing energy efficient TVs. Many of these manufactures showed side-by-side comparisons of their new TVs compared with previous years' models and the latest versions show up to a 50 percent reduction in power consumption.

The proposed California standard will encourage innovation by providing momentum for companies to adopt currently available energy efficiency technologies and to also justify investments in various emerging technologies. Currently available technologies allow TVs to meet the Tier 2 levels today and emerging technologies will allow TVs to significantly exceed Tier 2 levels over time. Given the typical price structuring within the industry, the average Californian should not see a cost premium for compliant TVs compared to today’s non-compliant TVs. They will however benefit from dozens to hundreds of dollars in energy cost savings over their TV’s lifetime, thus making the proposed standard extremely cost-effective for the state of California.

The LCD TV Association’s GreenTV Program is already working with major TV vendors to implement and promote new features, like an ambient light sensors, which will automatically lower the set brightness in a dark room by decreasing power to the backlight—thus saving energy and actually reducing potential eyestrain as well. This readily available technology can reduce power consumption by at least 30% (and up to 60% at times and in some implementations). Manufacturers can incorporate other technologies to further increase efficiency levels beyond Tier 2 levels, including but not limited to more efficient and less

lighting elements, RGBW vs RGB pixel structures, polarization recycling & brightness enhancement films, regional dimming, and more efficient electronics and power supplies.

We believe that many of the concerns expressed by independent retailers of specialty and “high-end” TV sets at the December 15, 2008 CEC TV workshop can be mitigated. Particularly, there were claims made that because a certain percentage of today’s TVs don’t meet the proposed standard, then these retailers would lose that same percentage of sales in the future after the standard becomes effective. This is clearly at odds with industry practices of improvements and TV product cycles. Put simply, with or without energy standards, retailers won’t be selling today’s models in the future. Manufacturers will continue to offer new models and these latest and greatest models will incorporate energy efficiency technologies and other “Green” features since consumers want them, as well as to ensure compliance with various new global standards including those being proposed by California.

In addition to complying with California energy standards, manufacturers will be developing TVs that meet or exceed Tier 2 levels for a variety of reasons, including but not limited to:

- Manufacturers may want to offer TVs that are eligible for utility incentives (e.g., the PG&E and SMUD incentive program launched in late 2008, which will likely be adopted in other parts of the country);
- Manufacturers want to make TVs that will meet or exceed the next revised Energy Star TV specification;
- Manufacturers want to ensure that their TVs meet various international standards and labeling requirements being developed in Europe, Australia, China, and Japan;
- Manufacturers want to ensure that their TVs meet standards being introduced in other states (i.e., as mentioned by the Appliance Standards Awareness Project at the December 15, 2008 workshop)
- Manufacturers want to provide TVs that can be sold at retailers with commitments for selling the most efficient TVs (e.g., the Wal-Mart pledge to sell TVs that are at least 30% more efficient than today’s TVs); and
- Manufacturers want to uphold their corporate commitments towards energy efficiency and environmental goals.

Given these factors and the fact that many TVs today can meet the proposed standards, we want to repeat our support of the December 2008 CEC Staff Draft report. We also encourage the Commission to finalize the TV rulemaking and publish standards as early as possible in 2009.

Please do not hesitate to follow up with any questions.

Sincerely,

Bruce Berkoff
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