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De Longhi comments on PAC Regulation

Additional submitted attachment is included below.



KENWOOD BRAUN

December 7, 2018

By E-mail

To: California Energy Commission
1516 Ninth Street, MS-14
Sacramento, California 95814

**De' Longhi Group comments on APPLIANCE EFFICIENCY REGULATIONS
RULEMAKING FOR PORTABLE AIR CONDITIONERS (Docket Number 18-
AAER-04).**

De' Longhi respectfully submits the following comments to the California Energy Commission. De' Longhi is a manufacturer of household appliances, which has been producing portable air conditioners for more than 25 years, and we support a reasonable efficiency regulations for portable air conditioners (PACs).

Nevertheless, we believe that the proposed effective date (February 2020) is absolutely unrealistic as most of the PACs actually on the market do not fulfil the proposed requirements and manufacturers do not have enough time to redesign, retool, and retest according to the new procedure and new standards for all the PAC models they offer for sale in California. We ask the CEC to wait for the publication of the DOE standard or at least to postpone the effective date to 2022.

De' Longhi appreciates the opportunity to submit these comments to CEC and would be glad to discuss these matters in more detail on your request.

Respectfully Submitted,

Alberto Aloisi
Group Product Compliance and Regulatory Affairs Manager
De' Longhi Appliances s.r.l.