

DOCKETED

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*Comment Received From: Association of Home Appliance Manufacturers (AHAM)
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Please see AHAM's comments on the Low Power Mode Roadmap Workshop

Additional submitted attachment is included below.



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Submitted via [Docket Portal](#)

October 11, 2021

J. Andrew McAllister, Ph.D.
Commissioner
California Energy Commission
Docket Unit, MS-4
Re: Docket No. 17-AAER-12
1516 Ninth Street
Sacramento, CA 95814-5512

Dear Commissioner McAllister:

The Association of Home Appliance Manufacturers (AHAM) writes to comment on the August 25, 2021 Staff Presentation for Low Power Mode Roadmap Workshop. AHAM represents manufacturers of major, portable, and floor care home appliances, and suppliers to the industry. AHAM represents more than 150 member companies that manufacture 90% of the major, portable and floor care appliances shipped for sale in the U.S. Home appliances are the heart of the home, and AHAM members provide safe, innovative, sustainable and efficient products that enhance consumers' lives.

The home appliance industry is a significant segment of the economy, measured by the contributions of home appliance manufacturers, wholesalers, and retailers to the U.S. economy. In all, the industry drives nearly \$200 billion in economic output throughout the U.S. and manufactures products with a factory shipment value of more than \$50 billion. In California, the home appliance industry is a significant and critical segment of the economy. The total economic impact of the home appliance industry to California is \$15.9 billion, more than 30,000 direct jobs and an additional 53,000 indirect jobs, \$2.4 billion in state tax revenue and more than \$5 billion in wages. The home appliance industry, through its products and innovation, is essential to U.S. consumer lifestyle, health, safety and convenience. 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.

Clearly Identify Scope of Products

Thank you for the opportunity to comment on the development of a Data Collection Procedure (DCP) that CEC will use to analyze energy consumption. As CEC considers a DCP, it would be beneficial to stakeholders to have a clear understanding of what products CEC considers in scope and eligible for regulatory action. While the workshop did identify a limited list of products,

CEC should further clarify that federally regulated products are exempt. This would include products with embedded standby/off energy use in a total product energy or efficiency metric. Additionally, products that are not plugged in when not in use should be identified as out of scope.

The description of products that would be in scope, is too broad and should be refined to identify specific products CEC seeks to review. Products considered in scope would also require a review of whether a specific model should be included due to certain functions or features (i.e., wifi capability). If a product model lacks features that merit inclusion, there is limited value to proposing a data collection procedure. A more refined list of products and product features will both narrow the scope and provide specific examples of what testing methods may be relevant for CEC's consideration.

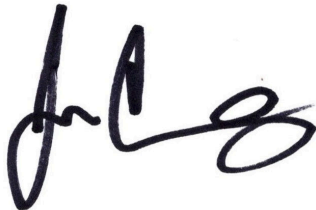
Test Procedures, Metrics and Program Goals Should be Clear

The staff presentation provided at the August 25 workshop implied that the initial data collection is voluntary. The presentation identifies participation rates, energy savings, and timeline but does not provide specific metrics to guide stakeholder participation. These targets should be established and shared publically. Retroactively setting goals when voluntary participation levels are deemed insufficient does not benefit CEC or stakeholders.

The development of the test procedure and program metrics and goals should be transparent and include stakeholders to determine how the data can be provided to CEC prior to any regulatory phase. Such a process could examine, for example, if CEC did not have enough manufacturers submitting data, reasons for the limited response and a better understanding of the data gaps. Clarity during all developmental phases of the program will allow a robust review of successes and failures. An open, coordinated effort may limit the need for mandatory regulations.

AHAM appreciates the opportunity to comment on the Staff Presentation for Low Power Mode Roadmap Workshop and the development of a Data Collection Procedure (DCP). We appreciate CEC's commitment to address this matter and look forward to continuing to work with CEC.

Sincerely,

A handwritten signature in black ink, appearing to read 'Jacob Cassady', with a stylized, cursive script.

Jacob Cassady
Director, Government Relations