

DOCKETED

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Comment Received From: Alexandria McBride

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ITI Comments on Battery Charger Systems Appliance Efficiency Rulemaking

Additional submitted attachment is included below.



March 19, 2018

Via E-mail

California Energy Commission (CEC)
Docket Unit, MS-4
1516 Ninth Street
Sacramento, CA 95814-5076

docket@energy.ca.gov

Re: Docket No. 18-AAER-02 for Portable Electric Spas and Battery Charger Systems Appliance Efficiency Rulemaking

Dear Commissioner McAllister:

As the premier advocacy and policy organization for the world's leading innovation companies, the Information Technology Industry Council (ITI) appreciates the opportunity to comment on the *Portable Electric Spas and Battery Charger Systems Appliance Efficiency Rulemaking* (Docket 18-AAER-02).

Harmonized standards are the most productive approach in reaching goals to reduce carbon emissions, and we support the CEC's effort to align California's battery charger requirements with the U.S. Department of Energy (DOE) Battery Chargers Energy Conservation Standard Final Rule. The DOE concluded that battery charger marking requirements were "redundant and an unnecessary burden to manufacturers"¹, and we strongly support the CEC's recommendation to align with the DOE and remove California's marking requirement for federally-regulated battery chargers.

Furthermore, considering that sales channels for state-regulated products differ significantly from sales channels for consumer products, we question the value and associated benefit in maintaining the "BC" marking requirement for state-regulated battery chargers. State-regulated products are typically professional products. These products are, in most cases, shipped directly from the supplier to the institution that procures such products. It is unknown to industry, at what point in the sales chain, the "BC" mark would provide the instrumental information to determine compliance since CEC's access to such products is non-existent without special arrangements.

We also urge the CEC to streamline the Modernized Appliance Efficiency Database System (MAEDBS) certification process for federally regulated battery chargers. On June 13, 2018, the Department of Energy (DOE) efficiency standards for battery charger systems takes effect, and it will be a violation of federal law to sell products in the US if they are not certified into DOE's Compliance Certification Management System (CMS) database. The additional MAEDBS reporting requirement would be

¹ 2016-06-13 Energy Conservation Program: Energy Conservation Standards for Battery Chargers; Final rule. Section 4.O: Marking Requirements. Available here: <https://www.regulations.gov/document?D=EERE-2008-BT-STD-0005-0256>



duplicative and a significant burden to the industry. Since the DOE expressed interest in working with the CEC to reduce duplicative reporting,² we strongly support collaboration between the two agencies on this issue.

We appreciate your consideration of our comments.

Sincerely,

A handwritten signature in black ink, appearing to read "AMcBride", is positioned below the word "Sincerely,".

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² Agency Information Collection Extension, With Changes. December 2017. Available here: <https://www.federalregister.gov/documents/2017/12/04/2017-26056/agency-information-collection-extension-with-changes>