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Proposed Amendments to the Title 20 Appliance Efficiency Regulations

Additional submitted attachment is included below.



May 14, 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-10 for Proposed Amendments to the Title 20 Appliance Efficiency Regulations

Dear CEC Staff,

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 proposed amendments to the Title 20 Appliance Efficiency Regulations (Docket 18-AAER-10).

As we stated in recent testimony, harmonized standards are the most productive approach in reaching goals to reduce carbon emissions, and we strongly 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. While many of the CEC's proposed amendments align standards with the DOE's final rule, we also identified a few areas of improvement to ensure CEC requirements clearly correspond with the DOE's standard. We appreciate your review of the comments below.

Summary of Key Issues

1. 'BC' Mark

We want to ensure that the Express Terms (15-day language) for the portable electric spas and battery charger systems appliance efficiency rulemaking, adopted on April 11, 2018, are included in the final Title 20 Appliance Efficiency Regulations.

From Express Terms:

§ 1607. Marking of Appliances

(d) Energy Performance Information

(10) Battery Charger Systems. Each **state-regulated** battery charger system shall be marked with a "BC" inside a circle. The marking shall be legible and permanently affixed to:

- (A) the product nameplate that houses the battery charging terminal or;
- (B) the retail packaging and, if included, the cover page of the instructions.



2. Inductive Charger Systems in Wet Condition

Per the DOE, only inductive chargers with rated battery capacity $\leq 5\text{Wh}$ that are designed for use in a wet environment (e.g. electric toothbrushes, waterpiks) are subject to the DOE's energy conservation standards in product class 1. Therefore, all other inductive chargers (that are not categorized in class 1) are not subject to federal regulations.¹

The CEC's proposed definition for "federally regulated battery charger" should clearly exclude inductive chargers that are used in wet condition, per the edits in red below.

"Federally regulated battery charger" means a device that charges batteries for consumer products, including battery chargers embedded in other consumer products. Backup battery chargers are not included as federally regulated battery chargers. Inductive charger systems that are not designed for use in wet environments are not included as federally regulated battery chargers.

3. Standards for Federally Regulated Battery Chargers

ITI strongly recommends the following edits to the proposed language in Section 1605.1 (w) to provide clarity.

(w) **Battery Chargers** and Battery Charger Systems.

(1) **Federally Regulated Battery Chargers Manufactured on or after June 13, 2018.**

Federally regulated battery chargers manufactured on or after June 13, 2018 must have a unit energy consumption (UEC) less than or equal to the prescribed "Maximum UEC" standard when using the equations for the appropriate product class and corresponding rated battery energy as shown in Table W-1: referenced in 10 CFR 430.2

[Strike Table W-1]

4. Filing by Manufacturers in the Modernized Appliance Efficiency Database System (MAEDbS)

As mentioned in earlier testimony, we urge the CEC to exempt federally regulated battery chargers from the MAEDbS certification requirement. Starting June 13, 2018, all federally regulated battery chargers must be certified into DOE's Compliance Certification Management System (CCMS) database in order to sell products in the US. CEC's additional MAEDBS reporting requirement would be duplicative and a significant burden to the industry. Since the DOE expressed interest in working with

¹ https://www.ecfr.gov/cgi-bin/text-idx?SID=c9dbafe3c54ecf1ee3bbb502608fca50&mc=true&node=se10.3.430_132&rgn=div8



the CEC to reduce duplicative reporting,² we strongly support collaboration between the two agencies on this issue.

Therefore, ITI recommends the following edits to Section 1606 (a).

Exceptions to Section 1606(a) of this Article: Section 1606(a) of this Article is not applicable to:

1. external power supplies,
2. compressors,
3. small electric motors,~~or~~
4. **federally regulated battery chargers, or**
5. à la carte chargers meeting the EXCEPTION noted in section 1605.3(w)(2) of this Article

Furthermore, according to the CEC's General Instructions for Submitting Appliance Data for Small Battery Chargers³, the CEC requires a test laboratory application to register small battery chargers in the MAEDbS, as well as requiring lab reauthorization, which deviates from the DOE's requirements. This means that completing both databases is not only duplicative but also different enough to be even more burdensome and may increase the opportunity for delayed approval of products in California that industry thinks are already registered. At the very least, alignment of process steps and requirement beyond test data is greatly needed

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>

³General Instructions for Submitting Appliance Data (Last Updated 5/16). Available here:
[http://www.energy.ca.gov/appliances/database/forms_instructions_cert/Electronics/Small%20Battery%20Chargers%20\(SBCS\).zip](http://www.energy.ca.gov/appliances/database/forms_instructions_cert/Electronics/Small%20Battery%20Chargers%20(SBCS).zip)