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INITIAL STATEMENT OF REASONS

Title 20, Division 2, Chapter 4, Article 4, Sections 1601-1609 Portable Air Conditioners

> California Energy Commission Docket No. 18-AAER-04 October 12, 2012

INTRODUCTION

The California Energy Commission proposes to adopt regulations for single-duct and dualduct portable air conditioners (portable air conditioners) after considering all comments, objections, and recommendations regarding the proposed action.

PROBLEM STATEMENT

The Warren-Alquist Act establishes the Energy Commission as California's primary energy policy and planning agency. Sections 25213, 25218(e), and 25402(c) of the Public Resources Code mandate that the Energy Commission adopt rules and regulations, as necessary, to reduce the inefficient consumption of energy and water by prescribing efficiency standards and other cost-effective measures for appliances whose use requires a significant amount of energy or water statewide.

One of the ways the Energy Commission satisfies this requirement is through the Appliance Efficiency Regulations (California Code of Regulations, title 20, sections 1601-1609), which contain definitions, test procedures, efficiency standards, and marking and certification requirements for state- and federally regulated appliances. Further, the regulations require that appliance manufacturers certify to the Energy Commission that their products meet all applicable state and federal appliance efficiency regulations before their products can be included in the Energy Commission's database of appliances approved to be sold or offered for sale in California.

Appliance energy efficiency is identified as a key to achieving the greenhouse gas (GHG) emission reduction goals of Assembly Bill 32 (Nunez, Chapter 488, Statutes of 2006). Senate Bill 350 (de León, Chapter 547, Statutes of 2015) established the Clean Energy and Pollution Reduction Act of 2015, requiring the Energy Commission to establish annual targets for statewide energy efficiency savings and demand reduction that will achieve a doubling of energy savings from buildings and retail end uses by 2030.

Therefore, in compliance with statute, the Energy Commission has prepared the proposed regulations to provide definitions, data reporting requirements, and efficiency standards for portable air conditioners sold or offered for sale in California, effective February 1, 2020.

Portable air conditioners operate by drawing in warm, humid air from a room, cooling the air and returning it to the room, and rejecting warm, moist air to an area outside the room. Consumer portable air conditioners are used in residential and light commercial applications and consist of one or two ducts that connect to a window using an adjustable window mounting bracket to allow for air intake and heat rejection.

Single-duct units draw air from a room into the unit and emit cooled air back into the room while rejecting heat and moisture to the outside via an outlet duct. Rejecting exhaust air outside, without replacing all of the room air drawn into the unit, creates a negative pressure within the room being cooled; this contributes to increased air infiltration into the room from the rest of the building or the outside environment. Due to this infiltration air, single-duct portable air conditioners are typically less efficient than dual-duct units, which do not create as much negative pressure.

In addition to the outlet duct for heat rejection, dual-duct portable units use an inlet duct to draw outside air into the unit as a heat exchanger. Heat is then rejected using this air, allowing the air drawn into the unit from the room to be cooled and returned to the room without creating a significant negative pressure. The additional air intake duct helps lessen the negative pressure effect caused by single-duct portable air conditioners, making dual-duct units more efficient.

California does not currently have energy efficiency or design standards for portable air conditioners. Portable air conditioners fulfill a useful niche for consumers in situations not well suited for other types of air conditioners, such as locations without adequate window or wall space for a room air conditioner, where cooling is only needed temporarily or on a seasonal basis, or where consumers plan to use the product in more than one location in the residence or facility. However, due to inefficiencies in this product, it's necessary to provide a standard to improve their efficiency and provide cost-savings to the consumer. The proposed standard is expected to have a positive impact on the California economy by providing cost-effective savings to California consumers.

No federal standards currently exist for portable air conditioners. The United States Department of Energy (DOE) considered energy conservation standards for portable air conditioners in a rulemaking in 2016, but to date has not published a final rule in the Federal Register. However, the DOE did publish a final test procedure for portable air conditioners in the Federal Register on June 1, 2016, making it the applicable test procedure for all single-duct and dual-duct portable air conditioners manufactured in or imported into the United States.

The Energy Commission currently has definitions, test procedures, and reporting requirements for spot air conditioners. Spot air conditioners are a type of "portable air conditioner" in the general sense (meaning an air conditioner that can be moved from room to room), but is distinct from single-duct and dual-duct air conditioners because they intake air from the room and output both the cool air and the rejected heat into the same room. The Energy Commission is not proposing any changes to the regulations for spot air conditioners.

The Energy Commission used information from the DOE rulemaking to support the proposed regulation for portable air conditioners.

PURPOSE

The purpose of the regulation is to carry out the Energy Commission's statutory mandate by providing statewide standards for portable air conditioners in the Appliance Efficiency Regulations. Portable air conditioners were added under the scope of the Appliance Efficiency Regulations in a previous rulemaking along with definitions and the federal test method. These regulations are proposing to provide additional definitions, data reporting requirements, and efficiency standards.

BENEFITS

The overall benefit of this rulemaking is to increase energy efficiency savings in the state by establishing energy efficiency standards for portable air conditioners.

The specific benefits of the proposed regulations would be cost savings to the consumer, lower statewide energy use, and lower statewide greenhouse gas emissions and criteria air pollutants associated with electricity production. It's anticipated that consumers would save approximately \$5 million in first-year savings and \$50 million annually after stock turnover in ten years. The proposed standard is expected to annually yield 369 gigawatt hours (GWh) in energy savings after stock turnover.

The proposed regulations will have a significant positive impact on the environment through energy efficiency gains and the reducing of avoided greenhouse gas (GHG) emissions and criteria pollutant emissions. Therefore, the Energy Commission could not identify any adverse environmental impacts associated with the proposed efficiency standards

STATEMENT OF SPECIFIC PURPOSE AND NECESSITY

SECTION 1602. DEFINITIONS

SPECIFIC PURPOSE

The specific purpose is to provide definitions for terms used in the regulations related to portable air conditioners.

NECESSITY

These definitions are necessary to ensure that the terms used within the regulations will have clear and unambiguous meaning to readers, including the public, and particularly to the persons and organizations affected by these regulations. The definitions support the test procedure requirements, labeling requirements, and certification requirements. These definitions represent the consensus position of the industry, with extensive input from manufacturers and energy efficiency advocates.

Most of the definitions for portable air conditioners are in existing text. The Energy Commission added definitions from DOE's test procedure for portable air conditioners that is currently within the Code of Federal Regulations (10 C.F.R. Part 430, Subpart B, Appendix CC, section 2) related to single-duct and dual-duct portable air conditioners. This is necessary to define the reporting requirements added to the regulations in section 1606, Table X and provide consistency for industry.

The definition for a *spot air conditioner* was amended to clarify that spot air conditioners are a *type* of portable air conditioner, rather than a *subset* of portable air conditioners. This clarification is necessary as spot air conditioners used to be their own category and are now included under portable air conditioners. However, spot air conditioners have their own test method and reporting requirements, and these requirements are not being amended in these proposed regulations.

The definition for a *Portable or Spot Evaporative Cooler* was amended to make it consistent with the definition for spot air conditioner.

SECTION 1605. ENERGY PERFORMANCE, ENERGY DESIGN, WATER PERFORMANCE, AND WATER DESIGN STANDARDS: IN GENERAL.

SPECIFIC PURPOSE

The specific purpose is to add language requiring dual certification for models that can configure as both a single-duct and dual-duct portable air conditioner.

NECESSITY

Portable air conditioners operate by drawing in warm, humid air from a room, cooling the air and returning it to the room, and rejecting warm, moist air to an area outside the room. Consumer portable air conditioners are used in residential and light commercial applications and consist of one or two ducts configurations that affect product performance. Some portable air conditioners have the option to operate in either a single-duct or dual-duct configuration. The Energy Commission is proposing to adopt the DOEs recommendation that both configurations meet the efficiency standards.

Subsection (g) has been added to the regulations to require those portable air conditioners that can operate as either as single-duct or dual-duct, meet the efficiency standard for both configurations. This is necessary because single-duct portable air conditioners are less efficient than dual-duct units. Requiring both configurations to meet the standard is consistent with DOE's recommendation, will provide consistency within the industry, and will ensure that consumers receive the energy efficiency and cost savings benefits regardless of which configuration they choose when they set up the portable air conditioner at home.

There are non-substantive numbering changes necessary to effectively communicate the requirements and standards in a precise and clear manner.

SECTION 1605.1. FEDERAL AND STATE STANDARDS FOR FEDERALLY REGULATED APPLIANCES

SPECIFIC PURPOSE

The specific purpose is to add a reference as to where the efficiency standards for all portable air conditioners can be found and to remove portable air conditioners from, and add spot air conditioners to, the list of appliances that do not have energy efficiency or design standards, and to renumber accordingly.

NECESSITY

The Appliance Efficiency Regulations contain mandatory requirements for both federally regulated and state-regulated appliances to provide manufacturers, distributors, retailers, and consumers of appliances with a clear and comprehensive set of requirements in a single location. The Appliance Efficiency Regulations additionally provide that standards for federally regulated appliances become state standards in the event of a federal repeal.

It's necessary to add subsection (d)(5) to identify where energy efficiency standards for portable air conditioners can be located within the Article.

Subsection (d)(6) has been amended to remove portable air conditioners and add spot air conditioners. As a category, portable air conditioners include single-duct, dual-duct, and spot air conditioners. Because these regulations are proposing energy efficiency standards for only single-duct and dual-duct air conditioners but not for spot air conditioners, it's necessary to remove the overarching category of portable air conditioners from this section and clarify and make specific that only spot air conditioners do not have efficiency standards.

There are non-substantive numbering changes necessary to effectively communicate the requirements and standards in a precise and clear manner.

SECTION 1605.2 STATE STANDARDS FOR FEDERALLY REGULATED APPLIANCES

SPECIFIC PURPOSE

The specific purpose is to add a reference as to where the efficiency standards for all portable air conditioners can be found and to remove portable air conditioners from, and add spot air conditioners to, the list of appliances that do not have energy efficiency or design standards and to renumber accordingly.

NECESSITY

The Appliance Efficiency Regulations contain mandatory requirements for both federally regulated and state-regulated appliances to provide manufacturers, distributors, retailers, and consumers of appliances with a clear and comprehensive set of requirements in a single location.

It's necessary to add subsection (d)(2) to identify where energy efficiency standards for portable air conditioners can be located within the Article.

Subsection (d)(3) has been amended to remove portable air conditioners and add spot air conditioners. The category of portable air conditioners includes single-duct, dual-duct, and spot air conditioners. Because these regulations are proposing energy efficiency standards for only single-duct and dual-duct air conditioners but not for spot air conditioners, it's necessary to remove the overarching category of portable air conditioners from this section and clarify and make specific that only spot air conditioners do not have efficiency standards.

There are non-substantive numbering changes necessary to effectively communicate the requirements and standards in a precise and clear manner.

SECTION 1605.3. STATE STANDARDS FOR NON-FEDERALLY REGULATED APPLIANCES

SPECIFIC PURPOSE

The specific purpose is to clarify and make specific the efficiency standard criteria for portable air conditioners, to remove portable air conditioners from the list of those with no energy efficiency standards, and to renumber accordingly.

NECESSITY

The Appliance Efficiency Regulations contain mandatory requirements for both federally regulated and state-regulated appliances to provide manufacturers, distributors, retailers, and consumers of appliances with a clear and comprehensive set of requirements in a single location.

The addition of subsection (d)(1) is necessary to provide the state energy efficiency standard for single-duct and dual-duct portable air conditioners. This equation reflects the

standard level that the DOE issued in its pre-publication final rule (which rule was not published in the Federal Register and therefore is not currently a federal standard) and aligns with DOE's published test procedure to measure product efficiency in terms of seasonally adjust cooling capacity (SAAC) and the combined energy efficiency ratio (CEER). Consistent with the requirements of the Warren-Alguist Act, the proposed standard level is cost-effective to consumers over the lifetime of the appliance and technologically feasible to achieve, and will yield significant energy savings in California. Individual purchasers of a portable air conditioner are estimated to accrue \$224 in lifecycle net monetary savings and zero net costs. Annual statewide energy savings after full stock turnover of the existing stock of portable air conditioners is estimated to be 369 GWh. The proposed standards are performance standards and do not prescribe specific methods of improving the efficiency of portable air conditioners. Manufacturers have several technically feasible options to improve the efficiency of their products including increased heattransfer surface area, increased heat-transfer coefficients, improved compressors, blower fans and duct or case insulation. Reduced standby power, variable speed compressors, thermostatic or electronic expansion vales, and alternative refrigerants such as propane or R-32.

An effective date of February 1, 2020 rather than January 1, 2020 is necessary to align the effective date with the manufacturers production cycle of portable air conditioners.

Subsection (d)(4) has been amended to remove portable air conditioners and add spot air conditioners. The category of portable air conditioners includes single-duct, dual-duct, and spot air conditioners. Because these regulations are proposing energy efficiency standards for only single-duct and dual-duct air conditioners but not for spot air conditioners, it's necessary to remove the overarching category of portable air conditioners from this section and clarify and make specific that only spot air conditioners do not have efficiency standards.

There are non-substantive numbering changes necessary to effectively communicate the requirements and standards in a precise and clear manner.

SECTION 1606. FILING BY MANUFACTURERS; LISTING OF APPLIANCES IN DATABASE

SPECIFIC PURPOSE

The specific purpose is to remove portable air conditioners from the list of appliances that are not required to have energy efficiency or design standards, add language requiring two separate certifications for models that can configure as both a single-duct and dual-duct portable air conditioner, and to provide the data reporting requirements for manufacturers of portable air conditioners.

NĖCESSITY

Manufacturers are required to provide specified information on each appliance sold or offered for sale in California to the Energy Commission's Modernized Appliance Efficiency Database System (MAEDbS). MAEDbS is the database used by manufacturers and

maintained by the Energy Commission that lists the appliances authorized to be sold or offered for sale in California.

In subsection (a), portable air conditioners have been struck from the exceptions of this section. It is necessary to strike out portable air conditioners because this rulemaking proposes to add reporting requirements for single-duct and dual-duct portable air conditioners. Spot air conditioners already have reporting requirements and will not change.

Subsection (a)(1)(H) has been added to require two separate certifications for models that can configure as both a single-duct and dual-duct portable air conditioner. This is necessary because single-duct portable air conditioners are less efficient than dual-duct units. Requiring both configurations to meet the standard is consistent with DOE's recommendation, will provide consistency within the industry, and will ensure that consumers receive the energy efficiency and cost savings benefits regardless of which configuration they choose.

Section D of Table X: The addition of portable air conditioners to Table X is necessary to provide the reporting requirements for manufacturers of portable air conditioners. It's necessary that manufacturers know the reporting requirements required to certify each model to the Energy Commission's appliance efficiency database to comply with regulation and be able to sell their product in California. The proposed reporting requirements align with the certification requirements proposed by DOE in its pre-publication final rule and are necessary data points to validate the submitted data for CEER and SACC to ensure all test results meet the required standard.

There are non-substantive numbering changes necessary to effectively communicate the requirements and standards in a precise and clear manner.

SECTION 1608.COMPLIANCE, ENFORCEMENT, AND GENERAL ADMINSTRATIVE MATTERS.

SPECIFIC PURPOSE

The specific purpose is to remove portable air conditioners as an exception not required to meet specified requirements in order to be sold or offered for sale in California.

NECESSITY

In subsection (a) portable air conditioners have been struck from the exceptions of this section. It is necessary to strike out portable air conditioners because this rulemaking proposes to add enforceable energy efficiency standards for single-duct and dual-duct portable air conditioners, and therefore will be enforcing those standards as well as the test procedures, marking, and certification requirements consistent with the remaining provisions in section 1608.

There are non-substantive numbering changes necessary to effectively communicate the requirements and standards in a precise and clear manner.

TECHNICAL, THEORETICAL, OR EMPIRICAL STUDIES, REPORTS, OR DOCUMENTS.

In addition to using information from the DOE's rulemaking to support this regulation, the Energy Commission also relied on input from various stakeholders, subject matter experts, and interested parties that provided information, feedback, and subject matter expertise from operational, technical, and manufacturing perspectives.

The groups and organizations that participated include:

Association of Home Appliance Manufacturers, Appliance Standards Awareness Project, California Investor Owned Utilities, De'Longhi Appliances, Desno Products and Services America, Electrolux, GE appliances, GREE Electric Appliances, Haier America, Honeywell, JMATEK, LG, Marshall Associates International, National Resources Defense Council, Oceanaire, and Temp-Air.

The documents relied upon include:

- <u>Technical Support Document</u>: Energy Efficiency Program for Consumer Products and Commercial and Industrial Equipment: Portable Air Conditioners. December 2016.
- Energy Conservation Program: Energy Conservation Standards for Portable Air Conditioners: <u>Final Rule</u>. December 28, 2016.
- Codes and Standards Enhancement (CASE) Initiative Analysis of Standards proposal for Portable Air Conditioners. October 2018.

CONSIDERATION OF REASONABLE ALTERNATIVES, INCLUDING THOSE THAT WOULD LESSEN ANY ADVERSE IMPACT ON SMALL BUSINESS

No reasonable alternatives to the proposed regulations have been proposed that would lessen any adverse impact on small business or that would be less burdensome and equally effective in achieving the purpose of the regulation in a manner that achieves the purposes of the statute being implemented.

The Energy Commission estimates annual California shipments of portable air conditioners to be 165,600. The estimated lifetime of a portable air conditioner is ten years so the lifetime of the regulation is also ten years because full turnover of existing, inefficient portable air conditioners will have occurred.

The proposed regulations require an efficiency level of Efficiency Level (EL) 2, as analyzed by the DOE. Under the proposed regulation, per unit incremental cost is estimated to be \$76 and per unit annual utility bill savings from reduced operating costs is estimated to be \$30. After full stock turnover (ten years), the annual statewide benefits are \$49.7 million and initial cost is \$12.59 million.

Under the proposed alternative 1, staff considered EL 3, as analyzed by the DOE, which is a more stringent efficiency standard for portable air conditioners. Under EL 3, the incremental cost of the improved efficiency of portable air conditioners increases to \$141 per unit, while annual savings from reduced electricity bills increases to \$46 per unit for the ten-year product lifetime. After full stock turnover, the annual statewide benefits are higher at \$76.18 million, while the incremental costs are also higher, at \$23.35 million.

Under the proposed alternative 2, staff considered EL 1, as analyzed by the DOE, which is a less stringent efficiency standard for portable air conditioners. Under EL 1, the incremental cost of the improved efficiency of portable air conditioners decreases to \$28 per unit, while annual savings from reduced electricity bills decreases to \$14 per unit for the ten-year product lifetime. After full stock turnover, the annual statewide benefits are lower at \$23.18 million and the incremental costs are also lower, at \$4.64 million.

SPECIFIC TECHNOLOGIES OR EQUIPMENT

The proposed regulations do not mandate a specific technology, and instead establish performance standards related to portable air conditioners that can be met with multiple types of equipment or technology.

ECONOMIC IMPACT ASSESSMENT/ANALYSIS

The Creation or Elimination of Jobs within the State of California The Energy Commission estimates that the regulations may potentially create a maximum of 25 jobs in California and will not eliminate any jobs. This is based on the DOE's Technical Support Document's indirect employment impact analysis. There is no direct impact on jobs because there is no production in the United States of portable air conditioners subject to the proposed standard. The DOE employment impact analysis estimates indirect national job creation or elimination resulting from possible standards. due to reallocation of the associated expenditure for purchasing and savings from operating more efficient portable air conditioners. Therefore, the Energy Commission has determined the proposed regulations may indirectly create jobs in California. The Energy Commission applied a 12 percent scalar representative of California's share of the national population to the number of jobs that the DOE estimated would be indirectly

created as a result of the proposed standards for portable air conditioners.

The Creation of New Businesses or the Elimination of Existing Businesses within the State of California.

There are no manufacturers in the United States of portable air conditioners and portable air conditioner shipments and sales are not expected to change significantly as a result of the proposed regulations. The economic impact on any retailers, distributors, or utilities is expected to be small compared to the total sales of these entities, and insufficient to support the creation or cause the elimination of any business. Therefore, the Energy Commission has determined that it is unlikely that any new or existing businesses in California will be created or eliminated.

The Expansion of Businesses Currently Doing Business within the State of California The businesses involved in distribution and sales of portable air conditioners may experience increased wholesale purchase prices of portable air conditioners due to the proposed standard; however, the Energy Commission assumes these costs are entirely passed along to the end consumer, so that there are no direct economic impacts of the proposed standard to these businesses. There are no manufacturers in the United States of portable air conditioners and portable air conditioner shipments and sales are not expected to change significantly as a result of the proposed regulations. Therefore, the Energy Commission has determined that businesses doing business in California will not be expanded.

Benefits of the Regulations to the Health and Welfare of California Residents, Worker Safety, and the State's Environment

The proposed regulation will benefit California residents and worker safety through the health benefits and cost savings of mandatory statewide standards for portable air conditioners. This includes definitions, reporting requirements, and efficiency standards. The specific benefits of the proposed regulations would be cost savings to the consumer and lower statewide energy use. The Energy Commission estimates savings of approximately \$5 million in first-year savings and \$50 million annually after stock turnover in ten years. The proposed standard is expected to annually yield 369 gigawatt-hours (GWh) in energy savings after stock turnover.

The proposed regulations will have a significant positive impact on the environment through energy efficiency gains and avoiding greenhouse gas (GHG) emissions and criteria pollutant emissions. Therefore, the Energy Commission could not identify any adverse environmental impacts associated with the proposed efficiency standards.

Results of the Economic Impact Assessment/Analysis

The Energy Commission concludes that (1) the proposal may indirectly create jobs within California, (2) it's unlikely the proposal will eliminate jobs within California, (3) it's unlikely the proposal will create new businesses in California, (4) it's unlikely the proposal will eliminate existing businesses within California, (5) it's unlikely the proposal will result in the expansion of businesses currently doing business within the state.

DUPLICATION OR CONFLICTS WITH FEDERAL REGULATIONS

No federal efficiency standards currently exist for portable air conditioners. The United States Department of Energy (DOE) considered energy conservation standards for portable air conditioners in a rulemaking between 2013 and 2016, but to date has not finalized the regulatory change in the Federal Registry. However, the DOE did publish a final test procedure for portable air conditioners in the Federal Register on June 1, 2016, (10 C.F.R Section 430.23(dd)) making it the applicable test procedure for all single-duct and dual-duct portable air conditioners manufactured in or imported into, the United States. The Energy Commission adopted this test procedure in a previous rulemaking.

The Energy Commission used information from the U.S. DOE's rulemaking to support this regulation.

EVIDENCE SUPPORTING FINDING OF NO SIGNIFICANT ADVERSE ECONOMIC IMPACT AFFECTING BUSINESS

The Energy Commission estimates that approximately 500 California businesses may be impacted by the regulations. However, these regulations are not likely to result in a significant adverse economic impact on any business.

The proposed regulation sets new efficiency standards that will require manufacturers to produce more efficient portable air conditioners. However, there no manufacturers of portable air conditioners in the United States. The Energy Commission assumes that portable air conditioner manufacturers will pass the incremental cost to improve the efficiency of an appliance onto the distributors and retailers, which will then pass on the cost to consumers.

Under the appliance efficiency regulations (sections 1608 and 1609), retailers are responsible for ensuring that the products they sell appear in the MAEDbS before they are sold or offered for sale in California. Because portable air conditioners are a newly covered product, the Energy Commission assumes that retailers will experience some additional costs associated with checking MAEDbS to ensure that the portable air conditioners they sell appear in the MAEDbS and are therefore compliant and lawful to sell in the state. The Energy Commission estimates that this will cost each company about \$25 per model. Energy Commission staff estimates that large-scale national home improvement stores carry approximately 160 in-scope portable air conditioner models that will require MAEDbS verification. Independently operated stores may carry fewer than ten in-scope portable air conditioner models. These are one-time costs and unlikely to be passed through to consumers and also unlikely to cause a significant adverse impact on businesses in California.

Some retailers may choose to incur additional costs if they rebrand an appliance that is not certified to MAEDbS and wish to sell it in California. These retailers are required to certify the appliances to California, and therefore will incur costs associated with reporting to the MAEDbS.

Sellers of electricity, both retail and wholesale, may experience slightly reduced sales of electricity due to the proposed standard. However, any reduction in sales is small compared to the total electricity sales of these entities and therefore negligible.

Energy Commission assumes that portable air conditioners are typically purchased by individuals, not businesses or small businesses. Therefore, there are no initial changes in the purchase costs for small businesses or typical businesses from the proposed standards.

FOR FURTHER INFORMATION

Inquiries concerning all aspects of the rulemaking process, including the substance of the proposed regulations or any other information upon which the rulemaking is based, should be directed to Corrine Fishman at <u>Corrine.Fishman@energy.ca.gov</u> or (916) 654-4976. The designated backup contact person is Patrick Saxton, who can be reached at <u>Patrick.Saxton@energy.ca.gov</u> or (916) 654-4274.