

DOCKETED

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*Comment Received From: Claire Miziolek
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Proposed Regulation for Portable Air Conditioners

Additional submitted attachment is included below.



Commissioner Andrew McAllister
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512

November 26, 2018

Re: Docket No. 18-AAER-04, Proposed Regulation for Portable Air Conditioners

Dear Commissioner McAllister:

Thank you for the opportunity to provide comment on the California Energy Commission's (CEC) proposed regulation of Portable Air Conditioners. The following comments are submitted by Northeast Energy Efficiency Partnerships (NEEP). NEEP is a regional energy efficiency organization working to advance efficiency in the Northeast and Mid-Atlantic US. We work collaboratively with a network of stakeholders that span state energy officials, efficiency program administrators, utilities, manufacturers, businesses, local efficiency organizations, and many others to maximize the benefits associated with federal appliance standards. Doing so provides economic benefits while protecting public health and the environment.

NEEP applauds the CEC on their national leadership in appliance standards. CEC standards often have implications expanding beyond the borders of California and have resulted in significant improvements in the efficiency of several products over the years through successful CEC implementation. NEEP is monitoring this rulemaking as the steps taken in California to set efficiency standards for these products will have implications for the rest of the nation and may ultimately impact these products in home and businesses in the Northeast. Specifically, NEEP is working with several states throughout the Northeast who are considering passing state-level appliance standards and in many cases are considering new standards for Portable ACs based on the DOE's unfinished rule. In May 2018, Vermont became the first state in the nation to regulate this product category, and NEEP encourages California and others to follow suit. The more states who pass aligned standards, the larger the impact of the standard.

In general, NEEP strongly supports this standard and encourages CEC to pass standards in this product category swiftly. The economics, energy, and environmental benefit have been established through the DOE Federal Appliance Standards process. Furthermore, by its nature, portable ACs are a growing product category with implications for low-income and elderly populations that make their efficiency especially important. Setting efficiency standards now is an important strategy to ensure equity and energy savings in this product category.

Thank you for your consideration of these remarks and please do not hesitate to contact me with any questions on these comments.

Sincerely,

A handwritten signature in black ink, appearing to read 'Claire Miziolek'.

Claire Miziolek
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