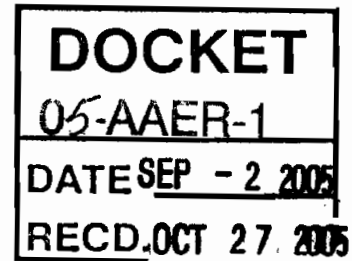


Hewlett-Packard Company
POB 15, MS145
Boise, ID 83707-0015



September 2, 2005

Docket Office
California Energy Commission
1516 Ninth Street, Mail Station 4
Sacramento, CA 95814-5512

Dear Sir or Madam:

I am writing this letter on behalf of Hewlett-Packard Company (HP) in response to the "15-Day Language" for the proposed Amendments to Appliance Efficiency Regulations (Express Terms) dated August 19, 2005.

HP submits the following comments to improve the appliance standards:

In December 2004, HP provided the following recommendation to the CEC on the appliance regulations:

HP recommends the Commission add language to the regulations for external power supplies (EPS) that further clarifies the range of EPS being considered. Specifically, the Commission should define that EPS only of nominal 115 volts and 60 hertz are covered by the new regulations. This clarification is needed because the proposed regulations require EPS testing in compliance with the ENERGY STAR test procedure, and given the international nature of the ENERGY STAR program, the test procedure accommodates the EPS voltage and frequency ranges of different worldwide regions. Therefore, the ENERGY STAR procedure requires EPS testing at both 115V/60Hz and 230V/50Hz. California's requirements are different, where virtually 100 percent of EPS coming into the State will be used at the nominal 115V/60 Hz level. Clarifying this in the regulations will help avoid significant confusion in the future.

HP assumes the intent to eliminate references to meeting the energy efficiency requirements for both 115 volts and 230 volts (page 125 of document) is a recognition of the issues HP described above. HP continues to believe the Commission should only establish requirements for EPS of nominal 115V/50 Hz capabilities. Unfortunately the proposed elimination of the specific references to 115V and 230V in the appliance document does not accomplish this goal because the document uses the Energy Star procedure for testing EPS.

On page 67 the appliance document states:

Power Supplies. *The test method for power supplies is US EPA “Test Method for Calculating the Energy Efficiency of Single-Voltage External AC-DC and AC-AC Power Supplies” dated August 11, 2004.*

The Energy Star EPS test procedure specifically states that EPS will be tested at both 115V/230V if the EPS has those capabilities; for example section 4.d states:

Test Voltage: *An ac reference source shall be used to provide input voltage to the UUT. As is specified in IEC 62301, the input to the UUT shall be the specified voltage $\pm 1\%$ and the specified frequency $\pm 1\%$. The UUT shall be tested at two voltage and frequency combinations: 115 V at 60 Hz and 230 V at 50 Hz if its nameplate input voltage and frequency indicate that it can operate safely under both conditions. If testing at both conditions is not possible, the UUT shall be tested at one of the above voltage and frequency combinations that is closest to its nameplate input voltage and frequency. If voltage and/or frequency ranges are not specified by the manufacturer (or the nameplate value is unclear), the UUT shall not be tested.*

To ensure the appliance rules are clear in their intent, HP recommends the Commission modify the wording on page 125 of the document to clearly state testing is only required at 115V/60Hz. Language such as the following should be considered:

Power Supplies. *The efficiency in the active mode, measured only at 115 volts and 60 Hz of power supplies manufactured on or after the effective dates shall be not less than the applicable values shown (expressed as the decimal equivalent of a percentage); and the energy consumption in the no-load mode, measured only at 115 volts and 60 Hz of power supplies manufactured on or after the effective dates shown shall be not greater than the applicable values shown in Table U-1 or Table U-2.*

HP appreciates the opportunity to provide these comments.

Sincerely,

Marty Marzinelli