

January 30, 2008

Ms. Jackalyne Pfannenstiel
Presiding Member, Appliance Efficiency Committee
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512

Mr. Arthur H. Rosenfeld
Commissioner
Associate Member, Efficiency Committee
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512

DOCKET
07-AAER-3

DATE JAN 30 2008

RECD. JAN 30 2008

Re: California 2008 Appliance Rulemaking Program Docket 07-AAER-3

Dear Chairperson Pfannenstiel and Commissioner Rosenfeld,

Thank you for the opportunity to comment on the proposals for product regulations under the 2008 Appliance Energy Standards Program and the excellent workshop on January 15, 2008.

The Association of Home Appliance Manufacturers represents producers of major, portable and floor care products. Included in our portfolio are microwave ovens as well as battery rechargeable appliances for kitchen, personal care and floor care use. These battery rechargeable products use a custom battery charger designed to work with a specific type of rechargeable appliance.

AHAM has several comments on the proposals that have been made to the Energy Commission for consideration. With regard to microwave ovens, AHAM would like to comment on presentations from the January 15, 2008 hearing which would indicated that the Commission should consider energy standards for microwave ovens. As was noted in one of the presentations, microwave ovens are covered products under federal law and so states are preempted from establishing separate energy standards. The U.S. Department of Energy is currently undertaking a rulemaking to address microwave energy consumption.

It is our understanding that the CEC is quite interested in pursuing a regulation on battery chargers. This proposal would include a wide variety of battery charger products from forklifts, to wheelchairs, to golf carts, to cell phones to appliances. Within this wide span of products, battery chargers operate in a considerably different sequence, different voltages or wattages, different manner of use by consumers, and have different opportunities for savings. We believe that appliance battery chargers are significantly different from those powering consumer electronics, commercial and industrial products and should have some differences in the regulatory framework.

AHAM has commented throughout the development sequence on the proposed test procedure from PG & E and Ecos Consulting. The measurement methods contained in the proposed test procedure are consistent with the techniques used by engineers to obtain the energy used in Active, No Battery, and Maintenance Modes. AHAM responded during the Ecos test procedure development regarding one

suggestion which would improve test technician worker safety. We would like to work with the CEC staff on this issue when the time is appropriate.

AHAM is interested in working with staff from the CEC and other stakeholders in the California energy regulations on developing a regulatory framework for battery charger energy. We believe there are enough differences between appliance battery chargers and other types that they can be handled under a slightly different regulatory framework. For example, most of the appliance type battery chargers spend no time in "No Battery" mode. Some appliance products are considered to be infrequently plugged into receptacles (many shavers, hair clippers, beauty products) and spend virtually no time in "Maintenance" mode. We believe the regulatory approach for these products should properly and accurately reflect the time spent in the representative modes. This will help us actually identify the energy used and energy saved by the citizens of California as this regulation is implemented. In addition, there are specific differences in the battery charger system for a few products used in wet locations to improve safety. These inductively charged products have inherent differences in the charging mechanism to protect consumers and need special attention, lest we eliminate a whole class of products. In all of these cases, we would like to work with the CEC to develop a regulation that addresses these differences. We believe this can be done quickly and efficiently. By developing a regulatory framework for appliance battery chargers as a sub-set of the overall CEC battery charger regulation, our manufacturers can make changes that directly affect the energy efficiency of these products and save energy for California citizens.

As the CEC pursues a possible standard for battery charger products, CEC should consider that most of these products are already regulated under the Commission's external power supply regulations. Any estimates of energy savings should take into account the costly changes manufacturers have already made to meet the existing standard and the energy efficiency of a wall-adaptor that meets today's external power supply requirements. We appreciate comments made at the workshop that a battery charger regulation will allow manufacturers of these products to have one regulation for which to design.

AHAM and its members pledge to work together with the staff of the CEC to develop a regulatory framework that accurately portrays the energy used by these products. We ask that the CEC direct the staff to engage with AHAM and other stakeholders to develop a cooperative agreement on how best to regulate the energy efficiency of these products.

It is our understanding that the U.S. Department of Energy must deliver a rulemaking on Battery Chargers by July 2011 and this will become effective two-years hence or in July 2013. We are hopeful that any regulatory model used in California will become a foundation of discussions for the DOE process as well as other jurisdictions in the United States and internationally.

Thank you for the opportunity to comment on this important rulemaking process.

Best regards,

A handwritten signature in black ink, appearing to read "Wayne Morris". The signature is fluid and cursive, with a large initial "W" and "M".

Wayne Morris
Vice President, Division Services