



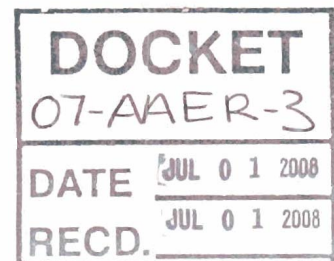
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July 1, 2008

Ms. Jackalyne Pfannenstiel  
Chair

Mr. Arthur Rosenfeld  
Commissioner

California Energy Commission  
1516 Ninth Street  
Sacramento, CA 95814



Subject: **2008 Rulemaking on Appliance Efficiency Regulations;  
Docket No. 07-AAER-03; Televisions**

Dear Ms. Pfannenstiel and Mr. Rosenfeld:

The Consumer Electronics Association (CEA) respectfully submits the following alternative to Pacific Gas and Electric Company's (PG&E's) proposal to set energy use limits for televisions. Our proposal affords the California Energy Commission, manufacturers, and retailers an ideal opportunity to work collaboratively to reduce energy consumption for televisions. We believe our proposal, combined with industry's ongoing participation in the Environmental Protection Agency's (EPA's) internationally-recognized ENERGY STAR program, and our members' continued dedication to energy efficiency improvements, is the most effective path to address and support energy efficiency for televisions.

CEA's proposal would (1) allow the Commission to collect comprehensive and accurate data on the power consumption of all televisions sold in the state; (2) inform consumers about television energy usage; and (3) promote consumer awareness of the EPA's newly revised and expanded ENERGY STAR program for televisions, particularly during key sales periods, through the transition to digital television broadcasting early next year. CEA's proposal is as follows:

*Part 1*

**Mandatory Reporting of Energy Use Data:** CEA suggests that the Commission amend Title 20 of the California Code of Regulations such that, effective February 17, 2009, any manufacturer intending to sell a digital television in the state must submit an energy use declaration for each model prior to sale. The declaration would include the model numbers of all televisions, the type of display technology employed (e.g., LCD, Plasma, CRT, Rear Projection), along with the active mode power consumption of the model(s) as calculated pursuant to IEC 62087, Edition 2.0. This mandatory reporting requirement would allow the Commission to better monitor and evaluate consumption and efficiency trends for televisions. It also would allow the Commission to review direct evidence that

technological advancements and market-oriented programs continue to drive energy efficiency improvements in televisions.

*Part 2*

Energy Use Disclosures: CEA welcomes the Commission to review and contribute to industry's recommendations and research supporting energy use disclosure requirements for televisions.

*Part 3*

Educational Campaign: CEA suggests that the Commission partner with the consumer electronics industry on a major consumer education campaign in California, in conjunction with the EPA and other key parties, designed to support and encourage consumer purchases of televisions meeting the new ENERGY STAR specification that becomes effective November 1, 2008. The new specification, a result of collaboration between government, industry and energy efficiency stakeholders, will allow Californians to purchase TVs that are up to 30% more efficient, according to the EPA. CEA is confident the new specification will result in substantial energy and cost savings. With at least two major television sales periods occurring before the February 17, 2009 transition to digital broadcasting, the time is right to launch a 2008-2009 campaign to raise consumer awareness of energy efficiency and ENERGY STAR for televisions.

In closing, the CEA and its 2,200 members, including most major TV manufacturers, reiterate their dedication to the design, production and marketing of energy efficient products that provide consumers with a broad range of product features at competitive prices. We appreciate your consideration of our proposal and welcome your feedback. Should you have any questions, please do not hesitate to contact us.

Sincerely,

/s/  
Michael Petricone  
Senior Vice President, Government Affairs

Douglas Johnson  
Senior Director, Technology Policy and International Affairs

Bill Belt  
Senior Director, Technology & Standards

cc: Melinda Merritt  
Harinder Singh