



January 19, 2009

Art Rosenfeld, Efficiency Committee Presiding Member
Jackalyne Pfannenstiel, Efficiency Committee Associate Member
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512

Re: Docket No. 07-AAER-3C, 2008 Rulemaking Proceeding on Appliance Efficiency Regulations

Dear Commissioners Pfannenstiel and Rosenfeld:

Pursuant to the Notice of Committee Workshop Re: 2008 Rulemaking Proceedings on Appliance Efficiency Regulations (Docket No. 07-AAER-3), we are pleased to submit these comments in support of the draft appliance efficiency standards for televisions in the active mode as possible amendments to the Appliance Efficiency Regulations of the California Energy Commission.

3M is an international, science-based company with worldwide sales in 2007 of \$24.5 billion. In 2005, 2006, 2007 and 2008, 3M was recognized by the U.S. Environmental Protection Agency and U. S. Department of Energy, winning the Sustained Excellence Award for Energy Management in recognition of continuous improvement in energy management. 3M was also selected as the sector leader among diversified industrial companies and was honored with a "gold class" distinction in the 2007-2008 Dow Jones Sustainability Index.

3M manufactures over 60 000 different products in diverse markets from healthcare and highway safety to energy-saving Vikuiti™ optical films for LCD devices, including televisions, monitors, notebooks and handheld devices. In 2008, 3M received special recognition from Energy Star for "Excellence in promoting superior energy performance in product design" with our Vikuiti™ optical film.

When 3M Vikuiti optical film is integrated into the backlight of flat panel LCD televisions, 3M film alone can reduce their power consumption by up to 37%. This reduction in power allows manufacturers to use fewer bulbs and inverters, as well as to use smaller power supply units. Using 3M optical film in combination with other energy efficient technologies, such as energy efficient lamps, can result in even greater power reduction.

A key point is that our technology improves the energy efficiency of all LCD TVs – independent of features. To address a concern raised during the December 15th CEC Public Workshop, 3M energy efficiency benefits work equally well with high end TVs.

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Our estimates indicate that, for many set makers, there are minimal incremental costs because they can recover costs throughout the supply chain through removing components, smaller power supply units, etc. For those set makers that are unable to realize these additional savings, we estimate their incremental costs would be less than \$20.

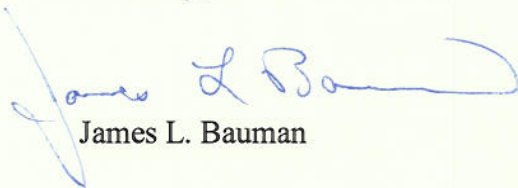
From a consumer perspective, an average 42" set would save hundreds of dollars over the life of the TV based on reduced operating costs.

We support the Staff Draft Report, released in December 2008, which proposes that the Commission adopt television standards that include two tiers of efficiency standards for active mode. However, given the rate of technological change since the Energy Star 3.0 program became effective, the high rate of compliance to Energy Star 3.0, and the fact that 107 sets currently qualify for Tier 2 based on Energy Star Dec 8, 2008 data, we encourage the Commission to forego the Tier 1 standard and to make the Tier 2 standard effective January 1, 2011.

In support of the PG&E and NRDC response, we ask the CEC to consider China's approach to the TV on-mode energy efficiency which includes luminance in the energy efficiency metric. We look forward to talking to you and other stakeholders on this key topic.

Thank you for the opportunity to submit these comments.

Sincerely,

A handwritten signature in blue ink, appearing to read "James L. Bauman", is written over a horizontal line.

James L. Bauman