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# SEARS HOLDINGS

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Misty N. Redman  
Director Government Affairs

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March 31, 2009

Mr. Adam Gottlieb  
Information Officer  
California Energy Commission  
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**DOCKET**

**07-AAER-3**

DATE MAR 31 2009

RECD. APR 01 2009

**RE:** Docket No. 07-AAER-3: 2008 Rulemaking Proceeding on Appliance  
Efficiency Regulations

Dear Mr. Gottlieb:

By way of brief background, Sears Holdings Corporation is the nation's fourth largest broadline retailer with approximately 3,900 full-line and specialty retail stores in the U.S. and Canada. Sears Holdings is the leading home appliance retailer as well as a leader in tools, lawn and garden, auto repair and maintenance and home electronics. We are the nation's largest provider of home services, with more than 12 million service calls made annually.

Because of our long retail history and leadership position we take great care and pride in providing our customers with as much timely and accurate information as possible. This is accomplished through in-store written materials, on-line channels and with our professionally trained sales associates. We do this to ensure that our customers are making informed decisions when they consider, select and purchase items at our stores or on-line.

As a corporate citizen located in the heart of thousands of communities we are continually working to promote better recycling and energy efficiencies in consumer electronics and other products we advertise, display and sell in our stores.

We are a major supporter of the ENERGY STAR program nationwide which continues to yield energy savings as consumers upgrade their televisions (and other home products).

Sears is well aware of the proposed guidelines by California Energy Commission (CEC) which in our view would impose an arbitrary energy use limit on televisions. While we all seek to promote better energy efficiencies we do not support these guidelines.

In fact, on January 19, 2009, we filed comments with the CEC opposing these guidelines (comments attached) through the Consumer Electronics Retailers Coalition (CERC) of which Sears is a leading member. CERC is a public policy organization consisting of the major retailers of consumer electronics products nationwide.

As such, on behalf of Sears and CERC, I would like to respectfully call your attention to information which currently appears on the CEC website: **[New] FAQs on New TV Efficiency Standards [NEW]**

**Who is supporting these proposals?**

The Natural Resources Defense Council (NRDC), the LCD Manufacturers Association, television component manufacturers such as 3M and Agoura; television manufacturer Vizio, and all three major California electric utility companies (Pacific Gas & Electric, San Diego Gas & Electric, and Southern California Edison) endorse the proposed regulations. Many well-known retailers including Wal\*Mart, Sears, Costco, Sam's Club, and Frys have all agreed to emphasize selling energy efficient TVs. Additionally, a recent survey showed California households overwhelmingly (89%) want their next television to be more energy efficient.

In our view, by carelessly lumping together both outright supporters of the guidelines with retailers such as Sears that have "agreed to emphasize selling energy efficient TVs", viewers are led to the incorrect conclusion that Sears is also supporting the proposed CEC guidelines.

As I have mentioned, while we are in fact working for greater efficacies through the Energy Star program, Sears does not support the proposed CEC guidelines and the suggestion that we do is patently false. As such, I would ask that the Sears reference be removed from this FAQ immediately to avoid any additional confusion on the part of consumers or members of the CEC. I'm confident you share Sears' desire to avoid any unnecessary confusion on this important topic.

We would like to work with the CEC in the most constructive manner possible and look forward to further communications.

Sincerely,



Misty Redman  
Director, Government Affairs  
Sears Holdings Management Corporation

CC: Mr. Arthur H. Rosenfeld  
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