



November 3, 2010

Mr. Michael Leao
Mr. Harinder Singh
California Energy Commission
Buildings and Appliances Office, MS-25
1516 Ninth Street
Sacramento, CA 95814-5512

DOCKET

09-AAER-2

DATE	NOV 03 2010
RECD.	NOV 04 2010

Subject: Letter of Concern – 2010 Rulemaking Proceeding Phase II on Appliance Efficiency Regulations - DOCKET# 09-AAER-2

Dear Messrs. Leao and Singh:

On behalf of the California State Sheriffs' Association, the California Police Chiefs Association, and the California Narcotic Officers' Association, we appreciate the opportunity to comment on the October 1, 2010 Ecos Consulting report commissioned by Pacific Gas and Electric Company (PG&E), "Analysis of Standards Options for Battery Charger Systems," which was recently made publicly available.

While we recognize the intent of the report to identify standards for achieving increased energy efficiency in battery chargers and power supplies, we write to share our early concerns regarding possible impacts of this report, if adopted by the Commission, on public safety and emergency response technologies and applications. Due to the timeline of the release of the report and the deadline for public comment, we continue to thoroughly review and analyze the report for potential impacts on public safety and offer the comments below as our preliminary concerns.

A number of critical public safety technologies could be impacted by the report recommendations including, but not limited to, two-way radios, portable devices in patrol units, cellular phones, GPS monitoring devices, emergency response equipment and related medical devices. There are unique factors relative to public safety applications that must be taken into account when setting battery charger standards including life-cycle performance, rapid charging capacity, and temperature functions.

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Public safety and emergency response entities have high standards for reliability, durability, and functionality in their communications equipment. Because performance in extreme conditions varies by battery chemistry, certain battery chemistries have improved cycle-life performance and can operate over wider temperature ranges, both of which are important to public safety activities.

Other important battery functions include rapid charging to be utilized in the field, multi-port charging, temperature variables, and port isolation.

Unfortunately, the current proposed regulations would jeopardize the use of many of the most reliable battery chemistries available and those that are currently being utilized by many local and state public safety personnel. We ask that you carefully consider the need for certain equipment and battery chemistries in these critical public safety positions.

Again, we appreciate the opportunity to comment and for your consideration of our concerns. We urge the Commission to continue to work with stakeholders and ask that as you move forward in discussions on this issue that you consider these public safety impacts.

Sincerely,

Nick Warner
California State Sheriffs' Association

John Lovell
California Police Chiefs Association
California Narcotic Officers' Association

Cc: Commissioner Anthony Eggert
Commissioner Jeffrey Byron