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Mr. Harinder Singh
Mr. Michael Leon
Dockets Office, MS-4
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512

March 16, 2011

DOCKET 09-AAER-2
DATE 3-14-11
RECD. 3-29-11

Re: Docket No. 09-AAER-02; 2010 Rulemaking Proceeding Phase II on Appliance Efficiency Regulations

Dear Mr. Singh and Mr. Leon:

Thank you for the opportunity to comment on the latest Battery Charger Proposals and for holding the workshop on March 3rd to explain the proposed regulations in detail. This workshop clarified some issues and answered some of our questions.

Wahl Clipper is a medium sized family owned company which has been in existence for 92 years manufacturing small personal care items mainly consisting of hair clippers, beard and mustache trimmers along with some massagers. As a company we are very environmentally conscious implementing extensive recycling programs, installing energy efficient lighting throughout the plant, and even planting prairie grass on our land around the plant for the environment and habitat. Even things such as our broken and non-usable skids are picked up and made into mulch. I express the above to help you understand that we also want to save energy with our products. However, these savings need to be correctly calculated and justified so that efforts and costs are not incurred where there is no benefit.

The following are the main items of concern for the personal care category, which I expressed at the workshop:

- 1) We do not believe the proposed increased costs to make products comply with the new proposals have been accurately calculated and therefore the payback for the California customer is not correct. In your cost savings analysis you use the raw material cost to calculate your customer payback. You cannot use this number as it does not take into account manufacturing overheads and retail mark-ups. An approximate number to use is 4 times the raw cost at retail. Therefore, if I use a more realistic raw material increase like \$1.50-\$2.00 the increase to the California consumer is \$6.00-\$8.00. In today's struggling economy your consumers do not need this unnecessary cost increase on products that are not going to generate a payback during the life cycle of the product.

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- 2) The energy savings are minimal, if any, for personal care due to the fact that accurate usage factors have not been used. To generate your energy savings you are assuming the rechargeable hair clipper is on charge 100% of the time. Our market research of 450 California men has indicated that less than 15 % of users leave their personal care items plugged in all the time. The 2006 study that was referenced for your usage data only listed one hair clipper. Since no other data was referenced I am assuming this is what you based your calculations on as the DOE Technical support document also had different usage factors, which were much different than yours. In addition, it is also stated on page 33 of this same report "Finally, because very few products were measured, more research needs to be done to help verify their usage patterns." I do not see where any more research was done. If what I have stated above is true, your energy savings are incorrect and need to be recalculated based on a statistically valid number of units.
- 3) We do not understand why CEC wants to regulate products that are going to be regulated by the DOE in the near future. We expect the DOE will implement their regulations within approximately one year of your proposed effective date.
- 4) If you do proceed with the regulation, the implementation date is unattainable for us with our engineering staff and the number of models (16) that need to be modified. This will take us a minimum of 2 years and even that will be difficult as there are several of our cord/cordless products in which a cost effective solution has not yet been developed. Even your own case report recommended two years for manufacturers to comply. Some of the issues we are faced with in making these products comply are as follows:
 - i. Design is not yet known
 - ii. There is no room for additional components.
 - iii. There are a very limited number of controllers that will work under 1.5 volts. They are expensive and have a very limited current, which means you need additional transistors to obtain the necessary gains for proper charging current.
 - iv. Multiple products must be changed which may include tooling (molds, dies) along with circuit boards and wire routing changes.
- 5) In the proposal the maintenance mode wattage is set at 0.5. However, in the Ecos report at the workshop on March 3 they stated the battery maintenance needed for nickel-based chemistries is .29 to .36 watts. Therefore, maintenance wattage should be set at a minimum of 0.66 watts if you allow 0.3 watts for no battery mode.
- 6) Since the exact details of the DOE regulation are not known as of this point we do not want to start making circuit board and tooling changes to all of our products until those details are known. This issue of not knowing all the requirements reduces the time we have to make changes to our products. I am sure you can understand that we do not want to make two design changes on the same product with in a one-year period of time.

In summary, we request that the CEC consider not imposing the requirement of this proposal on products which are going to be preempted by the DOE based on the reasons stated above. We will be providing, under separate cover, confidential data as requested which supports our points above. If you have any questions concerning the above issues, I would be happy to discuss further in detail.

Sincerely,

Wahl Clipper Corporation
Rick Habben 
Safety Compliance Engineer