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

May 31, 2011

DOCKET	
09-AAER-2	
DATE	MAY 31 2011
RECD.	MAY 31 2011

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

Dear Mr. Singh and Mr. Leao:

Thank you for the opportunity to comment on the latest Battery Charger Proposals and for holding the workshop on May 19th which, allowed additional input and we receive further clarification. In addition, I would like to thank Ken and Harinder for recent open communication and dialog regarding this subject matter. I believe this has been helpful for all of us in getting a battery charger regulation that saves energy and still gives flexibility to manufactures regarding manufacturing and design. Also, we are pleased that Maintenance and No Battery modes have been combined into one metric along with removal of power factor measurement.

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

- 1) For appliances that have less than a 5 Wh battery capacity I am recommending a revised 24 hour charge formula of $(16 + 1.6 \times Eb)$ or a minimum of 20-watt hours. I am open to either direction. As I stated in my presentation with appliances that have a very small battery capacity these products are using very little energy and still will not pass. I have a product that only uses .645 watts but will not pass the 24-hour charge requirement. It makes no sense for us to increase the battery capacity in products which do not need it in order for us to pass this requirement. This does not save any energy but only makes the product more expensive for the customer. If the formula can be modified as above we can keep the duty cycle out of the equation. If the formula can not be revised then duty cycle needs to be factored into the calculation to obtain accurate wattage use.
- 2) The maintenance and no battery mode formula is ok as in the latest proposal but if changes are made per some of the new proposals a minimum of 1 watt needs to be listed to cover the small personal care appliances with very small Eb's (less than 5 Wh)
- 3) The last item of concern is the effective date. As it stands right now July 2012 is the effective date. It has been stated that CEC may take longer than July 2011 to get everything finalized. I ask that you not put the effective date in the middle of the largest selling season. As a minimum the proposed effective

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date should not be earlier than January 2013. This allows us to make orders for the largest selling season without having mixed inventories. It also allows a clean break for price increases that are needed because of increased/different components.

In summary, as stated before we do not believe proposed increased costs to make products comply with the new proposals have been accurately calculated.

Therefore, payback for the California customer is incorrect in your cost savings analysis use in your raw material cost to calculate your customer payback. You cannot use this number as is does not take into account manufacturing overheads and retail mark-ups. An approximate number to use is 4 times raw cost at retail. In addition, the costs of components by Ecos was quoted based on tens of thousands which are not correct quantities for many products which may only be a couple thousand a year. This is also true when calculating the cost of power supplies. Therefore, if we use a realistic raw material increases like \$1.50-\$2.00 the increase to California consumer is \$6.00-\$8.00. In today's struggling economy your consumers do not need this unnecessary cost increase on products that do not generate a payback during the product life cycle.

Last, 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 DOE will implement their regulations within approximately one year of your proposed effective date. We still 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. 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