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Technology Policy & Regulatory Affairs

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California Energy Commission
Dockets Office, MS-4
Re: Docket No. 09-AAER-2
1516 Ninth Street
Sacramento, CA 95814-5512
(via: electronic mail docket@enegy.state.ca.us

Re: Docket No. 9-AAER-02; Rulemaking Proceeding Phase II on Appliance Efficiency Regulations

Panasonic appreciates the opportunity to comment on the California Energy Commission's (CEC) Draft Proposed Amendments to Appliance Efficiency Regulations; Phase II – Battery Chargers and Lighting Controls

Our comments include specific recommendations for modifications in the draft amendments as well as requested clarifications on key requirements under the amendments. Panasonic also would like to confirm our understanding, based on CEC staff comments expressed during the May 19, 2011, public workshop that televisions with USB ports are not within the scope of the battery charger regulation amendments.

Recommendations

Table W-2 (Standards for Small Battery Chargers-amendments page 10)

Panasonic recommends the statement "Eb = average battery capacity of all batteries in ports" be modified for consistency with EU regulations. The revised statement should read "Eb = rated battery capacity of all batteries in ports." EU regulations stipulate that for Portable secondary (rechargeable) batteries and accumulators:

1) The rated capacity of portable secondary nickel-cadmium batteries, and accumulators shall be measured according to standards IEC/EN 61951-1 and IEC/EN 60622
2) The rated capacity of portable secondary nickel-metal hydride batteries and accumulators shall be measured according to standard IEC/EN 61951-2
3) The rated capacity of portable secondary lithium batteries and accumulators shall be measured according to standard IEC/EN 61960.
4) The rated capacity of portable secondary lead-acid batteries and accumulators shall be measured according to standard IEC/EN 61056-1.

Eb: Battery Capacity – Small Charger Proposed Regulations indicates Eb: battery capacity. As battery capacity is determined by measuring the amount of discharging, which is dependent on the battery condition, Panasonic is requesting clarification on whether Eb means the indication of the battery.

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No Battery Power – Proposed limit of 0.3 watts is too stringent for battery charger systems. The CEC requirement for external power supplies is 0.5 watts at no load condition. A battery charger system at no battery condition is nearly the same as an EPS.

Exception to Section 1605 (w)(2) -- Panasonic is pleased the CEC recognizes the need to maintain spare or service parts for a 5-year-period after the regulation is scheduled to take effect. Some Panasonic notebook computers use a charger designed for several types of batteries for several different notebook PC models. Each has a DC input that is combined with an EPS to charge its batteries. However, the EPS is not provided with the notebook PC but instead is offered as a spare or service part. Based on the CEC exception, we would like to confirm this applies to the example described above.

Amendments Page 4 (w)(2)(A)

This section states "(A) multi-port battery chargers shall be tested for 24-hour efficiency and maintenance modes with a battery in each port." However, Panasonic believes this section is in error and should read, "(A) Multi-port battery chargers shall be tested for 24-hour charge and maintenance mode with a battery in each port." We would also like to clarify that only one test is required for multi-port chargers.

Also, if a charger needs an EPS as a power source and can be connected to several types of EPS, is it necessary to test every combination. Panasonic recommends testing requirements be minimized (e.g., testing with only maximum capacity battery and minimum capacity battery).

Televisions with USB ports are not within scope of the regulations:

During the May 19th Battery Charger Efficiency Committee Workshop, Panasonic asked CEC staff to confirm whether it was the Commission's intention to regulate as a battery charger any television which included a USB port. We explained although these USB ports were included primarily for the connection of peripheral devices such as wireless internet modems or flash memory devices, these USB ports are able to provide a limited 5 volt DC power to charge devices containing batteries which are plugged into the ports. Panasonic offers this functionality as a means for its battery powered 3D glasses could be recharged by connecting them to a USB port provided by the TV.

CEC staff confirmed it was not the intention of the regulation to consider a TV providing USB ports to be a battery charger and will not regulate it as such. However, staff stated that the 3D glasses containing the rechargeable battery and charging circuitry will be subject to the CEC battery charger regulations. In this case, we understand that the CEC has instructed that the battery charging and maintenance energy of the 3D glasses should be measured by connecting them directly to an "artificial" power supply which provides 5 volts DC. Therefore we interpret that this charging and maintenance energy is measured directly at this 5 volts DC input to the 3D glasses.

Labeling Requirements

Panasonic believes the additional proposed labeling requirement per level of efficiency, as advocated in the NRDC proposal, is unnecessary and would ultimately prove confusing to end users.

The proposed requirements for small battery chargers are rather stringent. Therefore, the differences in energy consumption between the four proposed levels would be necessarily small. This would make it difficult to justify the additional complication and possible market confusion which these additional levels might create.

Also, it appears that these levels are predicated on different regulations such as CEC, DOE, ENERGY STAR, and other undefined "jurisdictions". It should be noted that the product scope is often different for each of these regulations. A given product might be included in the scope of one regulation while being excluded from another. It would be confusing to place a "III" designation on a product which meets the ENERGY STAR energy qualification criteria in terms of its measured consumption, while simultaneously being excluded from the ENERGY STAR product scope.

Further, these referenced regulations are in many cases yet to be determined in terms of implementation schedule and actual minimum requirements as well as intended scope. The level "I" for example refers to "jurisdictions" which are completely undefined. The level "II" refers to a DOE specification which is yet undetermined, and the level 'IV" corresponds to a future ENERGY STAR regulation which is also unknown. It would be unrealistic for the Commission's current proposed amendments to require these additional labeling levels (I, II, III, and IV) to be required when so little is known about the criteria and applicability of these markings.

For the above reasons, Panasonic does not recommend the requirement of these additional level markings. It seems to be both unnecessary and confusing to the market.

Conclusion

Panasonic believes the CEC battery charger regulations are unneeded with the looming federal efficiency standards that are required to be promulgated by the U.S. Department of Energy. However, should the CEC determine it necessary to proceed with its own battery chargers regulation, we would appreciate your consideration of our comments and recommendations made in this letter. Please let me know if you have any questions about our views.

Sincerely,

Mark J. Sharp
Group Manager
Panasonic Corporation of North America

cc: Ken Rider
Hrinder Singh