



1111 19th Street NW > Suite 402 > Washington, DC 20036
t 202.872.5955 f 202.872.9354 www.aham.org

July 6, 2011

Via E-mail and First Class Mail

Mr. Harinder Singh
Mr. Michael Leao
Dockets Office, MS-4
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512
docket@energy.state.ca.us

DOCKET	
09-AAER-2	
DATE	July 06 2011
RECD.	July 06 2011

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

Dear Mr. Singh and Mr. Leao:

On behalf of the Association of Home Appliance Manufacturers (AHAM), I would like to provide supplemental comments on the California Energy Commission's (CEC) Draft Proposed Amendments to Appliance Efficiency Regulations (May 2011) which propose amendments to the Efficiency Standards for Battery Chargers and Lighting Controls, Draft Staff Report, Staff Analysis of Battery Charger Standards, (Draft Staff Report), Docket No. 09-AAER-02; 2010 Rulemaking Proceeding Phase II on Appliance Efficiency Regulations (March 2011).

AHAM represents manufacturers of major, portable and floor care home appliances, and suppliers to the industry. AHAM's membership includes over 150 companies throughout the world. In the U.S., AHAM members employ tens of thousands of people and produce more than 95% of the household appliances shipped for sale. The factory shipment value of these products is more than \$30 billion annually. The home appliance industry, through its products and innovation, is essential to U.S. consumer lifestyle, health, safety and convenience. Through its technology, employees and productivity, the industry contributes significantly to U.S. jobs and economic security. Home appliances also are a success story in terms of energy efficiency and environmental protection. New appliances often represent the most effective choice a consumer can make to reduce home energy use and costs.

AHAM has been active in working with the CEC on both the test procedures for External Power Supplies (EPS) and Battery Charger Systems (BCS).¹ AHAM efforts were aimed at improving

¹ As we have stated in the past, BCS are not EPS. External Power Supplies may be designed and sold as an end product by their component manufacturers. But battery chargers are designed uniquely to each application. It is not possible to completely redesign all models of battery chargers for a wide variety of consumer products and have all

the test procedure to make it more representative of the way the product is used by consumers, and to represent an accurate measurement of the energy savings potential.

During the May 19 workshop, CEC raised the issue of turning off additional functions during testing. In its previously submitted comments dated May 31, 2011, AHAM stated that we anticipated submitting comments to CEC on that issue. The Department of Energy (DOE) has subsequently determined how additional functions must be treated during testing in its final test procedure for battery chargers. We urge CEC to adopt DOE's testing approach, as the law requires it to do. But because that testing approach will discourage some features, such as LED charge status indicators, that encourage energy saving consumer behavior, we urge CEC to provide a credit to products that provide features that promote energy saving behavior in its proposed battery charger energy efficiency standard.

DOE's final rule on the test procedure for battery chargers states:

By requiring that any switches controlling the additional functionality be turned off, and any auxiliary cables or connections be disconnected, this method provides manufacturers with a cue to shut down the additional functionality. As a result, only the battery charging portion of the battery charger is measured during testing. DOE notes that if a manufacturer does not equip its product with a switch to shut off non-battery charger functions, it may continue to do so. During testing, the energy consumption of these functions would still be calculated as part of a given product's total energy consumption. 76 Fed. Reg. 31750, 31763 (June 1, 2011).


In order for regulated parties to comply with any future CEC energy efficiency standard on battery charger energy, CEC must use DOE's test procedure because, as of November 28, 2011, regulated parties may only make energy representations based on DOE's test procedure: "[a]s of November 28, 2011, manufacturers may not make any representation regarding battery charger . . . energy consumption or efficiency unless such battery charger . . . has been tested in accordance with the final rule provisions in appendix Y . . ." 76 Fed. Reg. at 31750.

Under DOE's test procedure, there are some technologies that prompt consumers to adopt energy saving behaviors that will be required to be calculated as part of a given product's total energy consumption. In particular, for example, LED lights that indicate the status of the charge function cannot be turned on/off via a switch and still provide functionality, and therefore, will be included in the battery charger's measured energy per the DOE test procedure. This will likely discourage manufacturers from including such a feature in order to more easily comply with a CEC or DOE standard. The absence of this feature will result in lost energy savings because consumers would have no way of knowing when charging is complete and could, thus, leave products plugged in and charging longer than necessary. Accordingly, we urge CEC to include an allowance, in the form of an energy credit for example, for technologies such as LED charge status indicators that encourage energy saving behavior. We will encourage DOE to take a similar approach in its upcoming rulemaking on battery charger energy efficiency standards.

these products tested by outside third-party energy and safety testing organizations in the amount of time suggested by the Draft Staff Report.

AHAM appreciates the opportunity to comment on the California Energy Commission's Draft Proposed Amendments to Appliance Efficiency Regulations (May 2011), and would be glad to further discuss these matters with CEC.

Respectfully Submitted,

A handwritten signature in cursive script, reading "Jennifer Cleary". The signature is written in black ink and is positioned above the printed name and title.

Jennifer Cleary
Director, Regulatory Affairs

cc: Ken Rider, California Energy Commission