



November 21, 2011

California Energy Commission
Docket No. 11-AAER-2
Docket Unit
1516 Ninth Street, Mail Station 4
Sacramento, California 95814-5504

DOCKET

11-AAER-2

DATE NOV 21 2011

RECD. NOV 21 2011

Subject: Comments Regarding California Energy Commission Docket Number 11-AAER-2, Notice of Proposed Action, Proposed Amendments to Appliance Efficiency Regulations, California Code of Regulations, Title 20, Sections 1601 through 1608

Dear Commissioners:

Thank you for the opportunity to comment on California Energy Commission (CEC) Docket Number 11-AAER-2, the Notice of Proposed Action (NOPA) regarding the Proposed Amendments to Appliance Efficiency Regulations, California Code of Regulations, Title 20, Sections 1601 through 1608. We would also like to thank the CEC and their staff for working with us throughout this process, their interest in and concern for our stakeholder feedback, and the changes to the proposed amendments that they have made based on our feedback. We have one final request that we would like to submit for consideration.

Request: Classify golf cars as non-consumer products, or extend the effectiveness date for golf car battery charging systems to the date for non-consumer small battery charging systems of January 1, 2017.

A consumer product is defined as "any article, other than an automobile, as defined in 49 U.S.C. Section 32901(a)(3): (1) of a type which in operation consumes, or is designed to consume, energy or, with respect to showerheads, faucets, water closets, and urinals, water; and which, to any significant extent, is distributed in commerce for personal use or consumption by individuals". Since over 90 percent of new golf cars are sold to commercial or industrial businesses, primarily golf courses, we disagree with the current classification of golf cars as consumer products and request that they be classified as non-consumer products.

The testing process that a golf car manufacturer, a battery charger manufacturer, and battery manufacturers undertake to qualify a new golf car battery charging system is extensive. After the design work is complete, which itself is a lengthy and involved process, all parties perform a number of rounds of lab testing. After the design iterations that result from the lab testing, a field test is performed where numerous fleets of golf cars are deployed to golf courses with the new battery charging system for a full season of use (6+ months). Only after a successful field test is complete can the golf car manufacturer begin transitioning the vehicle manufacturing process to include the new battery charging system and the battery charger manufacture submit the products for safety agency approvals, such as UL. This process often takes over 2 years and, because of the resources, time, and risk involved, is not a process that is undertaken often – the typical design life of a golf car battery charging system is expected to be at least 10 to 15 years.

For these reasons, an effectiveness date for golf car battery charging systems of January 1, 2013 would be nearly impossible to meet. Again, we disagree with the classification of golf cars as

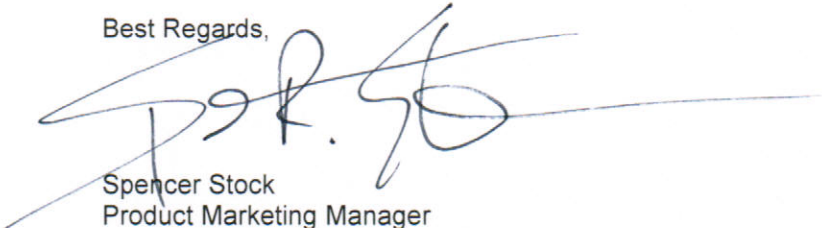
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consumer products, but extending the effectiveness date for golf car battery charging systems to the date for non-consumer small battery charging systems of January 1, 2017 would make it possible to achieve compliance in a reasonable manner.

Again, thank you for the opportunity to comment on the CEC proposed amendments to the appliance efficiency regulations for battery chargers. Please let us know if you have any questions regarding our comments or if we can be of any further assistance.

Best Regards,



Spencer Stock
Product Marketing Manager
Lester Electrical