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11-AAER-2

DATE OCT 19 2011

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October 19, 2011

Commissioner Karen Douglas
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

Subject: 2010 Rulemaking Proceeding Phase II on Appliance Efficiency Regulations
(Docket # 11-AAER-2)

Dear Commissioner Douglas:

Motorola Solutions, Inc. (MSI) has reviewed the Proposed Amendments to the California Energy Commission Appliance Efficiency Regulations relative to efficiency standards, certification, and labeling requirements for large and small Battery Charger Systems and related documents associated with the "Notice of Proposed Action." MSI supports the Proposed Amendments.

Throughout the process of developing a set of proposed amendments for these products, MSI strived to maintain a close working relationship with the staff at the CEC, and we feel we were successful in this regard. We were very pleased with the willingness of the Commissioners and staff to meet with us in person to discuss issues with various proposals, to acknowledge our concerns, and to work toward resolutions that were appropriate. In particular, we established a very positive working relationship with Mr. Ken Rider, whom we found to be knowledgeable, open-minded, and patient over the course of numerous telephone conversations on this topic. In addition, Mr. Rider was genuinely interested in understanding the unique characteristics of non-consumer Battery Charging Systems that made it such a challenge to craft a successful regulation.

Regarding the Proposed Amendments, MSI does have one request for clarification on a matter related to the newly-referenced DOE test method for Small Battery Charging Systems. In 10 CFR Section 430.23(aa) (Appendix Y to Subpart B of Part 430)(2011) section 3.4 on "Substitute External Power Supplies" the DOE test method requires that BCS with DC input that do not ship with an EPS, nor recommend one for use, be tested with 5.0 V DC for products drawing power from a computer USB port. This was also a requirement in the CEC's "Energy Efficiency Battery Charger System Test Procedure version 2.2" referenced in earlier drafts of the CEC regulation. MSI previously asked for clarification that the energy conversion losses to develop the DC source should not be included in the test measurement, and such clarification was received during the May 2011 workshop from Mr. Rider. MSI respectfully requests that this clarification be formalized in the final version of the Amendments and regulation.

In addition, MSI has a safety concern with the DOE test method's requirements to test batteries at a prescribed end of discharge voltage based on battery chemistry, as this may require testing at a point of discharge beyond that recommended by the battery manufacturer. Previously, in the Draft Proposed Amendments from May 2011, the CEC had addressed this issue and amended the requirements of the Energy Efficiency Battery Charger System Test Procedure version 2.2 to state:

"(D) The battery's end of discharge voltage may be used in place of values in the test method Part 1, Section III.F, Table D."

We respectfully ask that this same modification to the DOE test method be added back into the final version of the regulation for Small Battery Charging Systems. This will allow a manufacturer to specify the appropriate end of discharge voltage and prevent violation of the manufacturer's specifications during the testing process, resulting in a safer test.



While the energy efficiency requirements proposed for our non-consumer Small Battery Charging Systems will be challenging, we are confident the proposed regulation gives us the time needed to develop solutions that will accomplish the energy savings goals of the CEC while preserving product performance and minimizing disruption to our California customers. Motorola Solutions, Inc. has a strong legacy of continually improving the environmental performance of our product portfolio and we take pride in our accomplishments. Energy efficiency continues to be an important topic for our business and we intend to continue to leverage our role as technology innovators to actively participate in the energy efficiency community.

Sincerely,

A handwritten signature in black ink that reads 'Don G. Bartell'.

Don G. Bartell
Motorola Solutions, Inc.
Chief Sustainability Director

cc:

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