



KYLE PITSOR

Vice President, Government Relations

October 31, 2011

Submitted via email

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

DOCKET

11-AAER-2

DATE Oct. 31 2011

RECD. Nov. 01 2011

NEMA Changes to CCR Title 20 45 Day Language Regarding Exit and Life Safety Signage

The National Electrical Manufacturers Association (NEMA) appreciates the opportunity to provide the following change proposal to the subject 45 Day Language as published by CEC along with the Notice of Proposed Action on October 7, 2011. This letter is in follow-up to our letter of October 20, 2011.

As you may know, NEMA is the association of electrical equipment manufacturers, founded in 1926 and headquartered in Arlington, Virginia. Its member companies manufacture a diverse set of products including power transmission and distribution equipment, lighting systems, factory automation and control systems, and medical diagnostic imaging systems. Worldwide annual sales of NEMA-scope products exceed \$120 billion. These comments are submitted on behalf of NEMA Emergency Lighting section companies.

On further consideration of the issues of health and safety which are integral to the subject of battery charging systems used by emergency equipment, we must withdraw our previous suggestion and return to an earlier argument given your staff. We therefore withdraw our letter of October 20, 2011 and submit the following change to the 45-day language for Section 1601 (w) (3). We propose the language be changed to read: “used to charge a battery or batteries in products covered by the scope of and/or listed to UL Standard 924 Emergency Lighting and Power Equipment in an illuminated exit sign, as defined in Section 1602(1)”

NEMA thanks you for your consideration of this change proposal. If you have any questions on these comments, please contact Alex Boesenberg of NEMA at 703-841-3268 or alex.boesenberg@nema.org.

Sincerely,

Kyle Pitsor
Vice President, Government Relations

**National Electrical
Manufacturers Association**

1300 North 17th Street, Suite 1752
Rosslyn, VA 22209
(703) 841-3274
FAX (703) 841-3374
kyl_pitsor@nema.org