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11-AAER-2

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Via FedEx and Email

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

Re: Energizer Holdings Inc. comments to 45 Day Language regarding Amendments To Appliance Efficiency Regulations CEC Docket No 11-AAER-2

Dear Sir/Madam,

Energizer Holdings Inc. is a St. Louis, Missouri, consumer goods company operating globally in the broad categories of household and personal care products. Energizers household products division offers consumers the broadest range of portable power solutions, anchored by our universally recognized Energizer and Eveready brands.

Energizer Holdings Inc. respectfully submits these comments in response to the California Energy Commission Notice of Proposed Action in Docket Number 11-AAER-2, Proposed Amendments To Appliance Efficiency Standards for Battery Chargers and Moving Lighting Control Regulation From Title 24 to Title 20.

Energizer Holdings Inc. requests the definition of inductive chargers be explicitly defined to refer only to tightly-couple systems of proprietary chargers and receivers sold as an exclusive set (i.e. non-interoperable). The current definition of inductive chargers is broad and includes a new class of inductive chargers that are under development by Energizer Holdings Inc. and other companies in the industry which are intended to be interoperable. That is, one company's charger is designed to work with another company's receiver, and vice-versa.

In developing the proposed regulations for inductive chargers it appears the CEC only considered tightly coupled products that have been on the market for many years such as toothbrush chargers and electric shavers. These products are designed to be sold as a complete set, are not compatible with similar types of products from other manufacturers, and are designed to fit precisely into unique charging bases while charging.

However, new inductive charging standardization efforts and subsequent products are under development with initial products presently entering the marketplace. Because this industry is so new, the CEC could not have taken these types of products into consideration when writing the definition for inductive chargers. The new inductive charging products are designed so that consumers can charge

electronic devices from various manufacturers on a given charging pad. This technology is vastly different than that of tightly coupled inductive charging systems, such as toothbrush charging systems, partly due to the fact that the new devices are not always intended to be sold as an exclusive pair. The new inductive chargers are built on an open standard to allow for interoperability of charging devices, while existing tightly coupled inductive charging systems are built to be exclusive pairs. This difference in interoperability of charging devices adds complexity to the system which is not accounted for in the current CEC battery charging proposal.

The new inductive charging products will allow consumers to charge many of their wireless devices without the need for multiple power adaptors. This could greatly reduce the amount of discarded power adaptors in the future, reducing disposal concerns.

At this stage of market development, interoperable inductive charging systems should be afforded an exemption from efficiency metrics imposed by regulatory action which may otherwise hamper the development of such systems and thus reduce the accruing benefit of reduced disposal concerns.

In summary, Energizer Holdings Inc. proposed the CEC further define inductive chargers to include only tightly-coupled devices where the charger and receiver are sold as an exclusive set and are not designed to be interoperable with other devices.

Respectfully,

A handwritten signature in dark ink, appearing to read "Carin Stuart", with a stylized, flowing script.

Carin Stuart
Sr. Technology Engineer
Energizer Holdings Inc.