

Appliance Standards Awareness Project
American Council for an Energy-Efficient Economy
Northeast Energy Efficiency Partnerships
Northwest Energy Efficiency Alliance

November 21, 2011

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

RE: Notice of Proposed Action: Proposed Amendments to Appliance Efficiency Regulations (Docket No. 11-AAER-2)

This letter constitutes the comments of the Appliance Standards Awareness Project (ASAP), American Council for an Energy-Efficient Economy (ACEEE), Northeast Energy Efficiency Partnerships (NEEP), and Northwest Energy Efficiency Alliance (NEEA) in response to the California Energy Commission (CEC) request for comments on the Notice of Proposed Action (NOPA) regarding proposed amendments to appliance efficiency regulations. We appreciate the opportunity to provide comments, and we encourage the CEC to adopt the proposed battery charger system regulations. The proposed energy efficiency standards for battery chargers will yield significant energy savings and electricity bill savings and could positively influence the outcome of the U.S. Department of Energy (DOE) battery charger rulemaking.

Battery chargers waste a significant amount of energy. The staff analysis notes that battery chargers waste about 5.1 billion kWh each year in California, as only about 36% of the energy consumed by battery chargers is actually delivered to the batteries.¹ Battery chargers therefore represent a significant energy savings opportunity for California.

The proposed battery charger system regulations would provide large, cost-effective energy savings for California. The staff analysis estimates that after stock turnover, the standards would save 2,187 GWh per year, reduce peak demand by 250 MW, and save California consumers more than \$300 million on their electricity bills. In addition, the staff analysis calculates the payback period for the standards to be less than one year for both small and large charger systems.²

California has the opportunity to lead and set strong, cost-effective efficiency standards for battery chargers. Even in the context of the DOE rulemaking on battery chargers, California standards will achieve both short- and long-term energy savings for California.

- **California has the opportunity to accrue savings from standards for battery chargers for consumer products before the DOE standards take effect.** While DOE

¹ Staff Report: Staff Analysis of Battery Chargers and Self-Contained Lighting Controls. pp.1-2.

² *Ibid.* p. 12.

was required by statute to publish a final rule for standards for battery chargers by July 1, 2011, DOE has yet to publish even a proposed rule, and the timeline and outcome of the DOE rulemaking are still very much uncertain. Based on the proposed effective date of January 1, 2013 for CEC standards for consumer battery chargers, California would accrue, at a minimum, more than one year of savings before the effective date of the DOE standards.

- **The scope of coverage of the CEC rulemaking is broader than the scope of the DOE rulemaking.** The CEC scope of coverage includes battery chargers for both consumer and non-consumer products while DOE only has the authority to set standards for battery chargers for consumer products. Non-consumer battery chargers include chargers for lift trucks, handheld barcode scanners, and two-way radios. Standards for battery chargers for non-consumer products will achieve long-term energy savings for California.
- **A strong California standard for consumer battery chargers could potentially result in a stronger national standard than what might otherwise be achieved.** Historically, DOE has often followed California's lead in establishing appliance efficiency standards. We would hope that if California sets standards for battery chargers that achieve significant cost-effective energy savings using readily-available technology, DOE would establish standards that are no less stringent. Therefore, California standards would not only achieve long-term energy savings for the State from non-consumer battery chargers, but could also yield additional long-term energy savings for both California and the nation beyond what otherwise might be achieved due to the potential for California standards to positively influence the outcome of the DOE rulemaking. In addition, California standards for consumer battery chargers would likely spur efficiency improvements in the market that could have long-term energy-saving benefits regardless of the ultimate DOE standards.

We note that the Power Source Manufacturers Association (PSMA) has submitted comments expressing their support for California's strategy to increase the energy efficiency of battery chargers.³ PSMA represents manufacturers who make components for battery chargers and external power supplies, and they have stated that their member companies can provide solutions to help achieve the goal of energy savings from battery chargers.

The proposed marking requirements can help facilitate compliance and enforcement. The proposed circle BC mark, which would indicate compliance with the California standards, is similar to the current marking requirements for external power supplies. While the proposed marking requirements cannot replace compliance and enforcement activities, they can help to identify battery charger systems that may not comply with the California energy efficiency standards. In addition, the marking requirements will provide a framework for any future DOE or international marking requirements and can help facilitate international harmonization of battery charger efficiency standards.

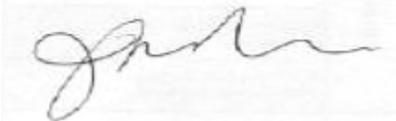
³ http://energy.ca.gov/appliances/battery_chargers/documents/2011-03-03_workshop/comments/Power_Sources_Manufacturers_Association_Energy_Committee_2011-03-14_TN-60027.pdf

Thank you very much for considering these comments.

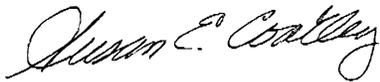
Sincerely,



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