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DOCKET

11-AAER-2

DATE NOV 18 2011

RECD. NOV 21 2011

California Energy Commission
Dockets Office, 11-AAER-2
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512

November 18, 2011

Re: Proposed Amendments to Appliance Efficiency Regulations 45 day Language

Thank you for the opportunity to comment on the appliance efficiency regulation 45 day language. We are appreciative of the changes that have been made to the regulation up to this point. However, the main issue of concern at this point is the effective date. As it stands right now January 1st 2013 is the effective date. This only gives us a year to do designs and implement the necessary changes on multiple products. We have brought up the issue several times that in your own CASE report a two year period is recommended. While this in and of itself is an issue, to make matters worse, as of this date we do not know the content of the DOE regulation. This makes redesign of our products very difficult as we do not know if the DOE regulations are going to be more or less strict. We can not afford to go through multiple product redesigns to meet the CEC regulations only to find out a few months later that these products will need additional design changes to meet the DOE requirements 12 months later. We do not have the time or resources to do two redesigns on several models in a one or two year period. We still do not understand why CEC wants to regulate products that are going to be regulated by the DOE in the near future as we expect DOE will implement their regulations within approximately one year of your proposed effective date.

In addition, as stated before we do not believe proposed increased costs to make products comply with the new proposals have been accurately calculated. Therefore, payback for the California customer is incorrect in your cost savings analysis use in your raw material cost to calculate your customer payback. You cannot use this number as is does not take into account manufacturing overheads and retail mark-ups. An approximate number to use is 4 times raw cost at retail. In addition, the costs of components by Ecos were quoted based on tens of thousands which are not correct quantities for many products which may only be a couple thousand a year. This is also true when calculating the cost of power supplies. Therefore, if we use a realistic raw material increases like \$1.50-\$2.00 the increase to California consumer is \$6.00-\$8.00. In today's struggling economy your consumers do not need this unnecessary cost increase on products that do not generate a payback during the product life cycle.

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We respectfully request that CEC consider not imposing the requirement of this proposal on products, which are going to be preempted by the DOE based on the reasons stated above. If the proposals are voted in as requirements we ask that as a minimum the effective date be pushed back to the middle of 2013 to give manufactures a chance to make the necessary design changes needed to meet the requirements. If you have any questions concerning the above issues, I would be happy to discuss further in detail.

Sincerely,

Wahl Clipper Corporation
Rick Habben
Safety Compliance Engineer

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