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11-AAER-2

DATE Nov. 21 2011

RECD. Nov. 21 2011

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November 21, 2011

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Via e-mail (docket@energy.state.ca.us) and hand-delivery

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

Subject: **Comments on Notice of Proposed Action: Proposed Amendments to Appliance Efficiency Regulations (Battery Charger Systems); Docket Number 11-AAER-2**

Cobra Electronics Corp. ("Cobra") respectfully submits the following comments in response to the Proposed Amendments to Appliance Efficiency (Battery Charger Systems) Regulation issued by the California Energy Commission Docket# 11-AAER-2.

Background:

Cobra Electronics is a marketing and sales company of consumer electronics products. Cobra is a market leader in many of the product categories in which we participate including Radar Detectors, Mobile Navigation devices for Truckers, Citizen Band Radios, GMRS Radios, and VHF Marine Radios. Cobra's Two-way Radios use external power supplies to charge their internal battery systems and would be subject to regulation being discussed in the CEC staff report.

Although Cobra imports all of the products we sell, the majority of the people who work for Cobra are US citizens and work at our corporate offices located in Chicago. Since we are a small company of only 150 people it is very difficult for us to participate in a meaningful way in these proceedings and welcome the opportunity to comment.

Comments:

Cobra Electronics would also like to reiterate the concerns brought up by the Consumer Electronics Association with respect to the CEC continuing to pursue this duplicate regulation that is presently being worked on by the Department of Energy. Cobra believes the proposed requirements for Two-way radios will cost the consumer more than it saves and will only be in effect for a short period of time before the federal regulation in the same product category goes into effect.

Cobra does not understand where the CEC came up with their data for the Table A-4 Duty Cycle which lists Two-Way Radios as 19% charge, 31% maintenance and 50% no battery. This duty cycle is totally unrealistic for the radios we sell in the state of California. It is our contention that these products are infrequently used, and will produce very little energy savings for the people of California as a consequence. Our Two-way radios use External Power Supplies (EPS's) to charge batteries internal to these products. These products are charged mainly for vacation and weekend activities, not for everyday use and we do not believe people leave the charger plugged-in while not in use. It is our impression that the CEC used a commercial application as a the use-case and felt that the majority of these radios are used in this manner. The commercial-use case is only true for a minority of the units sold in California which means that the majority of radios sold are infrequently used (as described above).

Even if we use California's duty cycle measurements, we found other possible problems when calculating energy use. Cobra measured the radios we sell in California and found if you took the average energy use of these radios that our average energy use came out to be 18.15 Kwh. This is very close to the energy use disclosed in the CEC staff report of 18.2 Kwh. The problem with this calculation is that it doesn't consider the volume differences between different models. Our lower cost radios have smaller batteries and consume less power than our high-end models which have larger batteries and consume more power. Since the power consumed by the grid in California is based on the number of units in service, this volume consideration must be taken into account. When taking volume into account, our volume weighted average declines from 18.15 Kwh to 10.72 Kwh. This is a substantial difference between Cobra's numbers and the ones used in the CEC staff report to calculate energy savings to the people of California.

Knowing the energy use of each of our radios, we went on to calculate the total energy savings to upgrade them to meet this new Battery Charger regulation. We found on lower end units that we were already close to meeting the regulation and the higher end units needed to be modified to meet the new requirements. If you calculate a weighted average savings based on the number of units sold, the average radio would save about \$0.085 per year for a total of \$0.68 over the 8 year lifetime of the product. After taking into account the cost of implementation, the actual dollar savings will be much less than what the commission is projecting.

Respectfully Submitted,



William Chamberlain
Vice President, Engineering and Quality
Cobra Electronics Corporation