

Comments to CEC Appliance Efficiency Regulations due 11.21.2011

We are concerned about the Exception language and the Electric Vehicles industry (our underline emphasis):

*These exceptions are necessary because electrically-powered motor vehicles, with some exceptions; Class II and III medical devices; battery chargers with greater than 300 volts; analyzers; and voltage and frequency independent uninterruptable power supplies are exempt due to having unique characteristics that were outside the scope of study and research conducted by the Energy Commission and the proposed test procedure.*

Definitions of concern are (our underline emphasis):

*“Battery analyzer” is being added for the specific purpose and rationale of defining a product that is excluded from the scope of the battery charger systems in Section 1601(w).*

*This is necessary to clarify the type of product that will not be covered by the proposed regulations.*

Language regarding Listing is also of concern (our underline emphasis):

*Section 1606. Filing by Manufacturers; Listing of Appliances in Database.*

*EXCEPTION 4 to Section 1606(a)(3)(D) is being added for the specific purpose and rationale of allowing manufacturers of large battery charger systems to certify multiple battery charger systems using the testing results of two or more representative battery charger system models, provided that all models so certified are designed to charge batteries of the same chemistry and design.*

*This will be allowed until July 1, 2014.*

*This is necessary in order to temporarily ease the initial testing and certification burden of the regulations on businesses certifying a large quantity of models with low sales volume.*

Staff determination methods are of concern (our underline emphasis):

*The staff of the Energy Commission investigated two alternatives to the proposed battery charger systems regulations:*

*The first alternative was to choose more stringent energy efficiency limits for the appliances in the scope of this regulation.*

It was determined that this would increase the effectiveness of the regulations in terms of resulting energy savings but would be more burdensome to business and less cost-effective to consumers.

*Therefore, this alternative was rejected.*

The second alternative was to choose a less stringent standard or to not adopt any standards at all.

*This alternative was less effective in terms of resulting energy savings and therefore was rejected.*

There appears to be favoritism for the Electric Vehicle industry without real concern for the consumer.

Federal tax dollars from the US Department of Energy has been granted for a Smart Grid. The Los Angeles Department of Water and Power LADWP plans to invest in capital projects on the pockets of the ratepayer.

The City of Los Angeles has awarded, through the Department of Housing and Urban Development, funding for Battery/Electric Vehicles Manufacturers.

Again, the risk is with the taxpayer, not the manufacturer.

You are giving the Electric Vehicle Industry a free pass.

There is no real basis for any benefit derived due to lack of regulations.

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