



Philips Electronics North America Corporation

January 3, 2012

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

DOCKET

11-AAER-2

DATE Jan 03 2012

RECD. Jan 03 2012

RE: Docket No. 11-AAER-2

Dear Commissioners:

Philips Electronics sells personal care, consumer electronic, inductively charged tooth brush, exit signs and emergency lighting and medical products that use battery chargers. We have provided comments throughout the CEC rulemaking process regarding battery chargers.

We appreciate the willingness of staff to engage stakeholders during the process and staff has addressed many of our concerns. The CEC has not, however, formally responded to any of the comments that Philips or other stakeholders have provided to the CEC. In particular the CEC has not responded to any of our comments from the 45 day language. As a result it is fruitless to provide any additional comments since we have no idea how the CEC has addressed the comments on the 45 day language. We can only reiterate our previous comments since we do not believe that the 15 day language addresses them. This procedural flaw is exacerbated by the CEC making additional changes in the 15 day language without providing any explanation for these changes. We are at a loss to understand how we can provide comments without an explanation from the CEC of the changes. Fundamental fairness requires agencies to describe the basis for their proposals.

Thank you for consideration of our comments.

Sincerely,

Ric Erdheim

Ric Erdheim
Senior Counsel

1300 I Street NW, Suite 1070 East
Washington, DC 20005
Tel: 202-962-8550
Fax: 202-962-8560