



DOCKET

11-AAER-2

DATE Jan 03 2012

RECD. Jan 03 2012

January 3, 2012

Commissioner Karen Douglas
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

Subject: Phase II on Appliance Efficiency Regulations (Docket # 11-AAER-2)

Dear Commissioner Douglas:

Motorola Solutions, Inc. (MSI) has reviewed the 15-day language concerning the Proposed Amendments to the California Energy Commission Appliance Efficiency Regulations relative to efficiency standards, certification, and marking requirements for large and small battery charger systems and related documents associated with the "Notice of Proposed Action." MSI supports the language of the Proposed Amendments.

We are pleased to see that the language of the Proposed Amendments has been modified to rectify a concern with the DOE test method that we expressed during the previous comment period. The DOE test method for Small Battery Charging Systems contains a requirement to test batteries at a prescribed end of discharge voltage based on battery chemistry, which may require testing at a point of discharge beyond that recommended by the battery manufacturer. The CEC now allows battery's end of discharge voltage to be used in place of values in the DOE test method Part 1, Section III.F, Table D.

MSI also made a request for clarification during the previous comment period related to the DOE test method for Small Battery Charging Systems. In 10 CFR Section 430.23(aa) (Appendix Y to Subpart B of Part 430)(2011) section 3.4 on "Substitute External Power Supplies" the DOE test method requires that BCS with DC input that do not ship with an EPS nor recommend one for use be tested with 5.0 V DC for products drawing power from a computer USB port. MSI asked that the energy conversion losses to develop the DC source should not be included in the test measurement, and assurance was received during the May 2011 workshop from Mr. Rider. We hope that this type of clarification will be published in a future "FAQ" document or other support material.

Throughout the CEC rulemaking process, MSI strived to maintain a close working relationship with the staff at the CEC. We were very pleased with the willingness of the Commissioners and staff to meet with us in person to discuss issues with various proposals, to acknowledge our concerns, and to work toward resolutions that were appropriate. In particular, we want to recognize the hard work of Mr. Ken Rider, whom we found to be genuinely interested in understanding the unique characteristics of non-consumer Battery Charging Systems so as to craft a successful regulation.

Motorola Solutions, Inc. has a strong legacy of continually improving the environmental performance of our product portfolio and we take pride in our accomplishments. We continue to work on saving energy in other ways as well, such as developing alternative-energy solutions for our products as well as purchasing electricity from renewable sources, where we have been recognized by the US EPA. Energy efficiency continues to be an important topic for our business and we intend to continue to leverage our role as technology innovators to actively participate in the energy efficiency community.

Sincerely,

Don Bartell
Motorola Solutions, Inc.
Chief Sustainability Director



cc:

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