



APPLIANCE STANDARDS  
AWARENESS PROJECT

16 Cohasset St.  
Boston, MA 02131  
Tel. 617 363 9101  
[www.appliance-standards.org](http://www.appliance-standards.org)  
[info@appliance-standards.org](mailto:info@appliance-standards.org)

May 8, 2013

California Energy Commission  
Dockets Office, MS-4  
1516 Ninth Street  
Sacramento, CA 95814-5512  
Submitted by email to: [docket@energy.ca.gov](mailto:docket@energy.ca.gov)

California Energy Commission

**DOCKETED**  
**12-AAER-2F**

TN 70679

MAY 08 2013

Re: Invitation to Participate in the Development of Appliance Efficiency Measures  
General comments for Docket 12-AAER (2A, 2B, 2C, 2D, 2E, 2F, 2G)

Dear Commissioners,

The Appliance Standards Awareness Project supports the California Energy Commission Order Instituting Rulemaking approved on March 14, 2012 and submits these general comments in response to the Invitation to Participate (ITP) issued on March 20, 2013.

The Appliance Standards Awareness Project (ASAP) organizes and leads a broad-based coalition effort that works to advance, win and defend new appliance, equipment and lighting energy efficiency measures which deliver large energy, water, consumer, public health and environmental benefits. We recognize California's important role in this process.

California, which has historically taken on the pioneering work of drafting and adopting state appliance efficiency standards, test procedures, marking and labeling requirements, and other efficiency measures, has another important opportunity on the table now. With this rulemaking, California can further cement its leadership role in the development and adoption of groundbreaking efficiency standards. CEC standards, test procedures, and other efficiency measures have often formed the basis for national standards and have led to enormous energy, cost, and CO<sub>2</sub> savings in California and in the U.S. The current rulemaking has tremendous savings potential, both for the state and for the nation and we urge you to fully consider each of the sixteen products included in Phase 1 of the rulemaking.

ASAP has been closely following the CEC rulemaking progress to date and plans to stay actively engaged during the proceedings. We support the full range of products identified in the Invitation to Participate and urge the CEC to take advantage of this historic opportunity to further lower energy use in California and, in all likelihood, the country.

Thank you for considering these comments.

Andrew deLaski, Executive Director  
Appliance Standards Awareness Project