



American Council for an Energy-Efficient Economy

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May 9, 2013

California Energy Commission

Submitted by email to [docket@energy.ca.gov](mailto:docket@energy.ca.gov)

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

California Energy Commission

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

TN 70704

MAY 09 2013

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.

ACEEE has been a leader in national appliance, lighting, motor, HVAC, and plumbing fixture efficiency standards. We helped negotiate the original NAECA standards, led negotiations for standards included in the 1992 and 2005 Energy Policy Acts, as well as those in the 2007 Energy Independence and Security Act, as well as subsequent consensus standards revisions. We have also led efforts to identify promising targets for state standards and have conducted analysis and testified on specific standards for adoption in California.

California plays a unique leadership role in developing and adopting new appliance efficiency standards, test procedures, marking and labeling requirements and other efficiency measures. This latest rulemaking represents another opportunity for California to exercise this leadership. 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.

ACEEE 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.

Sincerely,

Jennifer Amann, Buildings Program Director  
American Council for an Energy-Efficient Economy