

NEEP Comment Letter to CEC re: Appliance Efficinecy Measures ITP

5/9/13

California Energy Commission

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California Energy Commission Dockets Office, MS-4 General comments for Docket 12-AAER 1516 Ninth Street Sacramento, CA 95814-5512

Submitted by email to: docket@energy.ca.gov

Re: Invitation to Participate in the Development of Appliance Efficiency Measures

Dear Commissioners,

Northeast Energy Efficiency Partnerships (NEEP) is writing in support of efforts by the California Energy Commission to develop and adopt appliance standards, test procedures, marking and labeling requirements, and other efficiency measures for products listed in the Invitation to Participate (ITP) issued on March 20, 2013.

NEEP was founded in 1996 as a non-profit whose mission is to serve the Northeast and Mid-Atlantic to accelerate energy efficiency in the building sector through public policy, program strategies and education. Our vision is that the region will fully embrace energy efficiency as a cornerstone of sustainable energy policy to help achieve a cleaner environment and a more reliable and affordable energy system.

As a regional organization dedicated to accelerating energy efficiency, we appreciate the forwardthinking work of the California Energy Commission (CEC) in this area because our states often benefit from the efficiency measures the CEC adopts. CEC standards, test procedures, and other efficiency measures have often formed the roadmap for state standards promoted and adopted in our region. All but one state in our region have adopted state standards that had originally been developed in California. In fact California's efforts to adopt state energy efficiency standards, and the subsequent adoption in other states have led directly to dozens of national standards; Standards that have achieved enormous energy, cost, and CO2 savings in California and in our region as well. The current rulemaking has tremendous savings potential and we urge you to fully consider each of the sixteen products included in Phase 1 of the rulemaking.

NEEP has particular interest in seeing standards development move forward for the category of consumer electronics products. NEEP's Market Strategies team in embarking on a process to develop a regional market strategy for business and consumer electronics. The existence of state minimum efficiency standards for a number of key products would provide our process with important standards options.

NEEP plans to follow the CEC rulemaking proceedings and stay engaged in 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, in our region as well.

Thank you for considering these comments.



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Sincerely,

Susan E. Coakley, Executive Director

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