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California Energy Commission

DOCKETED

13-AAER-01

TN 72507

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February 3, 2014

California Energy Commission
Docket No. 13-AAER-1
Docket Unit
1516 Ninth Street, Mail Station 4
Sacramento, California 95814-5504

Dear Honorable Members of the California Energy Commission,

Jon Dickinson
Global Lead, Printing and
Personal Systems
HP Corporate Affairs, Strategy &
Operations
T 650-391-6489
dickinson@hp.com

On behalf of the Hewlett-Packard Company, we want to extend our thanks to you and your staff for working closely with our industry on the various appliance efficiency regulation proposals. Most recently we have worked with your staff on the battery charger regulation and our comments today pertain to this within the context of the Proposed Amendments to Appliance Efficiency Regulations. We have been supportive and continue to be supportive of this regulation.

We ask that you clarify three items for us:

- 1) **On page 223 that (f) Filing by Third Parties 1(A) and (B) both are “one-time” submissions.** Are we correct to assume this language does not require annual submissions but only “one-time” submissions? Typically, when we complete forms of this type, such as for the U.S. Department of Energy, we submit a supplier authorization form one-time for each supplier. This authorization applies to all products and/or models the suppliers register with the government agency.
- 2) Pg. 223 (f) Filing by Third Parties (1) (B): “before or with the first submittal made by the third party,” the manufacturer submits to the third party and Executive Director. Before the language stated, “Delegation of Authority is sent to CM who then submits Delegation of Authority and 3rd party certifier application to CEC”. **Please clarify whether this declaration is required “one-time” and whether this provision requires a dual submission of the form to the Executive Director AND the 3rd Party.** HP would recommend that the language require the form be filed “one-time” to the California Energy Commission only. This would be consistent with procedural standards employed by the U.S. Department of Energy.

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- 3) Finally, on page 220, there is an option to file electronically but the Executive Director has to approve the use of a unique digital identifier for this purpose. **Do you have an example of an acceptable digital identifier?**

We truly appreciate your assistance in clarifying these important questions. We thank the CEC for the opportunity to provide written comments and look forward to interacting with Commissioners and staff. For any questions or comments, please do not hesitate to contact me at (650) 391-6489 or dickinson@hp.com

Sincerely,

A handwritten signature in black ink, appearing to read "Jon Dickinson", with a stylized, cursive script.

Global Lead, Printing and Personal Systems
HP Corporate Affairs, Strategy and Operations
Hewlett-Packard Company

cc: Docket@energy.state.ca.us
Harinder Singh