

2014.10.20

Steve Uhler's comments Re: Docket No. 12-AAER-1 per [http://www.energy.ca.gov/appliances/enforcement/notices/2104-09-02\\_SB\\_454\\_nopa.pdf](http://www.energy.ca.gov/appliances/enforcement/notices/2104-09-02_SB_454_nopa.pdf)

Dear State Energy Resources Conservation and Development Commission,

I am Steve Uhler, California Citizen,

Thanks for allowing me to comment on Appliance Efficiency Regulations, Administrative Civil Penalties, California Code of Regulations, Title 20. Public Utilities and Energy Division 2. State Energy Resources Conservation and Development Commission, Chapter 4. Energy Conservation, Article 4. Appliance Efficiency Regulations, Section 1609, August 25, 2014, Section 1609. Administrative Civil Penalties.

I have made efficient use of energy a way of life for me, as described in this video clip [http://youtu.be/\\_BE47rMtAWM](http://youtu.be/_BE47rMtAWM), taken from a California State Senate Energy, Utilities and Communications Committee video.

I ask, are you sure that enacting these regulations will not create circumstances that will preclude me from developing, installing, or operating a solar device on my own property?

Appliances that I use and will use in the future in my solar devices, may become unavailable to me because you do not have a method to separate the grid only powered appliances from those that are and will be used in my solar devices. I will not purchase appliances that are not in the Appliance Efficiency Database or are not otherwise exempt.

This will preclude me from developing, installing, or operating these solar devices on my own property.

I don't believe the State Energy Resources Conservation and Development Commission is allowed to cause circumstances that will do that.

PRC 25605(d) Under no circumstances may the commission preclude any person from developing, installing, or operating a solar device on his or her own property.

see [http://leginfo.legislature.ca.gov/faces/codes\\_displaySection.xhtml?lawCode=PRC&sectionNum=25605](http://leginfo.legislature.ca.gov/faces/codes_displaySection.xhtml?lawCode=PRC&sectionNum=25605).

The code that I believe will cause me not to purchase appliances that can be solar powered easily because they run on low voltage direct current and can also be run on alternating current is show below.

CALIFORNIA CODE OF REGULATIONS, TITLE 20:

Section 1601 (a) Refrigerators, refrigerator-freezers, and freezers that can be operated by alternating current

electricity, including but not limited to refrigerated bottled or canned beverage vending machines, automatic commercial ice-makers, refrigerators with or without doors, freezers with or without doors, walk-in coolers, walk-in freezers, and water dispensers, but excluding the following types:

- (1) consumer products with total refrigerated volume exceeding 39 ft<sup>3</sup>;
- (2) commercial refrigerators, commercial refrigerator-freezers, and commercial freezers with total refrigerated volume exceeding 85 ft<sup>3</sup>; except that walk-in coolers and walk-in freezers are not excluded;
- (3) blast chillers; and
- (4) automatic commercial ice makers with a harvest rate less than 50 lbs./24 hours and automatic commercial ice makers with a harvest rate greater than 2500 lbs./24 hours.

Section 1609. Administrative Civil Penalties.

(a) Violations Subject to Administrative Civil Penalties.

- (1) Any person, including a retailer, manufacturer, contractor, importer or distributor, that sells or offers for sale an appliance, which is not listed in the Appliance Efficiency Database, is in violation of Section 1608(a)(1) and may be subject to an administrative civil penalty for each unit of the appliance that was sold or is offered for sale.

A solar device that does not include the appliance that is powered by solar, is a solar device that is impossible to make use of and makes no sense. Please consider that a solar device contains one or more appliances to be of use.

I have looked up refrigerators I wish to use in my solar devices, they are not in the Appliance Efficiency Database and appear not to be exempt.

Are these refrigerators sold for residential use exempt?

[http://www.northerntool.com/shop/tools/category\\_alternative-renewable-energy+dc-powered-refrigerators-freezers](http://www.northerntool.com/shop/tools/category_alternative-renewable-energy+dc-powered-refrigerators-freezers)

With this AC/DC option available :

[http://www.northerntool.com/shop/tools/product\\_200395644\\_200395644?isSearch=121107](http://www.northerntool.com/shop/tools/product_200395644_200395644?isSearch=121107)

Here is their sizing guide, note it is the Sun Danzer - System Sizing for Residential Use.

<http://www.northerntool.com/images/downloads/charts/121105.pdf>

I have looked up portable luminaires sold by Home Depot that say they are California Title 20 Compliant, they do not appear in the Appliance Efficiency Database.

I notified Home Depot of these types of errors.

See <http://www.homedepot.com/p/Hampton-Bay-64-1-2-in-Brushed-Nickel-Floor-Lamp-AF36006CA/202564429>. (Note, I have no use the for the compact fluorescent lamps. I use the far more efficient low voltage direct current LEDs in my solar devices. No power factor worries, direct current is unaffected by power factor, therefore I should not be restricted by power factor.)

This is the same portable luminaire less lamps, <http://www.homedepot.com/p/Hampton-Bay-64-1-2-in-Brushed-Nickel-Floor-Lamp-528299/202742925>. Nice portable luminaire, can't buy it in California. I am precluded from installing it as my solar device because of unnecessary costs if I have to buy and dispose of compact fluorescent lamps for which I have no use, as in the the same portable luminaire sold in California by Home Depot <http://www.homedepot.com/p/Hampton-Bay-64-1-2-in-Brushed-Nickel-Floor-Lamp-AF36006CA/202564429> that is packaged with lamps.

Please don't impede my progress. Please be careful and not increase my costs by place barriers of unnecessary testing and certification of appliances capable of being solar powered that I wish to use in my solar devices. Please don't require me to buy the less efficient compact fluorescent lamps or LEDs that run on 120 volts when I wish to purchase a portable luminaire of which I will install the far more efficient low voltage direct current LEDs used in my solar devices.

I have a tried the inefficient short lived compact fluorescent lamps. I will skip the inefficient 120 volt LEDs that are powered by the inefficient grid that uses natural gas power plants that waste 60% of the the input energy. I have gone to the more efficient low voltage direct current LEDs that are powered by clean 100 percent solar renewable energy. Solar powered refrigeration will be easy if you are careful in your regulations and don't place barriers on the use of appliances that can be powered by low voltage direct current, which are easily powered by clean 100 percent solar renewable energy.

Ever onward,

Steve Uhler  
California Citizen  
[sau@wwmpd.com](mailto:sau@wwmpd.com)