



California Energy Commission

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**NRDC Comments on CEC Appliance Efficiency Standards
Enforcement Regulations
15-Day Language Dated April 24, 2015**

Docket No. 12-AAER-1

May 8, 2015

Submitted by:

Christa Heavey, Pierre Delforge
Natural Resources Defense Council

On behalf of Natural Resources Defense Council (NRDC), which has 2.4 million members and online activists, more than 380,000 of whom are Californians, we respectfully submit these comments on the California Energy Commission's (CEC) Appliance Efficiency Standards Enforcement Regulations 15-day language posted on April 24, 2015.

NRDC supports the proposed changes to the regulations in the 15-day language. Section 1609(b)(3)(C) clarifies the number of violations as a separate factor to be considered in the assessment of administrative civil penalties, as was intended in the previous language. Furthermore, the specification in Section 1609(c) for the use of certified or registered mail to deliver the notice of violation was a change requested by multiple stakeholders and will help insure receipt of the notice. NRDC supports these clarifications and recommends approval of the 15-day language.

NRDC commends the commission for its work on this issue. Appliance efficiency standards are the most cost-effective way to meet California's energy needs and carbon pollution reduction goals, but strong enforcement is key to this success. SB 454 (Pavley) estimated that a significant share of appliances sold and offered for sale in California do not meet the state's energy efficiency standards. Effective enforcement of existing standards could save Californians several billion dollars in reduced utility bills over the next decade.

NRDC appreciates the opportunity to comment on the proposed regulations and supports approval of the 15-day language. NRDC thanks the Energy Commission for its commitment to developing effective enforcement regulations that will help California consumers and businesses get the most environmental and economic benefits out of

NATURAL RESOURCES DEFENSE COUNCIL

111 SUTTER STREET | SAN FRANCISCO, CA | 94104 | T 415.875.6100 | F 415.875.6161 | NRDC.ORG

existing and future appliance efficiency standards. Thank you for your consideration of NRDC's comments.

Respectfully submitted,



Christa Heavey
Sustainable Energy Fellow

Natural Resources Defense Council
cheavey@nrdc.org



Pierre Delforge
Director, Energy Efficiency in the
High Tech Sector
Natural Resources Defense Council
pdelforge@nrdc.org