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Docket No. 04-AAER-1
Docket Office
California Energy Commission
1516 Ninth Street, Mail Station 4
Sacramento, CA 95814-5512

Via E-Mail: docket@energy.state.ca.us

To The Commission:

The Power Tool Institute (PTI) is a trade association which represents the major manufacturers of power tools. Our members represent over 95% of the power tools sold in the U.S. market. This industry is the one of the leading manufacturers of rechargeable products and has an interest in the effect that this regulation may have upon those products. PTI is offering the following comments in response to the California Energy Commission on the proposed amendments to the power tool and appliance efficiency regulation with respect to external power supplies. For many years, PTI members have been committed to energy efficiency and new models of cordless power tools continue to become more efficient in every aspect of energy consumption.

We are writing to you today to request that the California Energy Commission (CEC) explicitly exclude power tool battery chargers and the power sources for such power tool battery chargers for the following reasons:

1. The regulation and referenced test method were developed for external power supplies (EPS's) and not for power tool battery chargers and as such were written without consideration for the differences between the two. The assumption that a power tool battery charger adapter is identical to an EPS is erroneous. The regulation is insensitive to the fact that a considerable amount of a power tool battery charger's functionality may be present in the adapter portion. This functionality may relate to the performance or safety of the power tool battery charger and these considerations have not been weighed against any potential energy savings.

2. The regulation would evaluate EPS's as end-products but would require the separation of one component of an end-product power tool battery chargers. This treats power tool battery chargers both differently and inappropriately compared to EPS's. No other products covered by the proposed regulation cover components in this manner. If it was the CEC's intention to regulation power tool battery chargers, then it should be done with a separate and appropriate regulation and test method.

3. The Codes and Standards Enhancement (CASE) study performed by ECOS consulting for Pacific Gas and Electric Company (PG&E), lumps EPS's and power tool battery charger adapters together even though it is clear that ECOS is aware that these are different classes of products. When power tool battery charger adapters are evaluated separately, it becomes evident that the regulation would fail to provide payback for these products. The CEC should

not pursue regulation on power tool battery charger adapters if the benefit to Californians is not dramatic and clearly evident.

4. Power tool battery chargers represent a complicated interaction of power sources, control and monitoring circuitry and electrochemistry. The CEC recognizes these facts and has elected to defer the development of regulations and test methods until they can be addressed appropriately with experts from those manufacturers that are most knowledgeable of the issues. At the public hearing regarding this regulation, there was acknowledgement that the energy savings from this regulation was minimal compared to the anticipated savings from a true power tool battery charger regulation. For industry to expend effort on unneeded changes to charger adapters when that effort could be invested in more substantial energy savings is a waste of effort and is not in the best interests of Californians.

5. When EPS regulations were first proposed, it was with the supposition that these products were purchased "off the shelf" from power supply suppliers and would not take away from the important tasks of product engineering and manufacturing. Power tool battery chargers, including their adapters, of the type used by our industry, are designed specifically for each application. This represents a substantial burden upon PTI manufacturers who will need to divert effort from programs to improve the performance and safety of tools to an exercise with little public benefit.

In summary, we believe that CEC's current approach is not appropriate for power tool battery chargers and CEC should change the scope of its draft program's test procedure and regulation so that power tool battery chargers are excluded. The time, effort and expense that it would take to implement these requirements would have little public benefit as compared to the anticipated benefit derived through the cooperation of government and industry towards the development of a truly appropriate regulation.

Please contact me if you have any questions.

Sincerely,

Robert G. Stoll

ROBERT G. STOLL
Technical Director

RGS/jlb
pti

cc: R. Michael Martin, CEC (Mmartin@energy.state.ca.us)
Standby Power Subcommittee
Peter Domeny, Robert Bosch Tool Corp.
Wayne Morris, AHAM

From: "Morris, Wayne" <wmorris@aham.org>
To: <docket@energy.state.ca.us>
Date: Tue, Nov 2, 2004 11:28 AM
Subject: FW: Notice of Proposed Action - Docket Number 04-AAER-1

-----Original Message-----
From: PTI/Stoll:jlb [mailto:JBoyle@taol.com]
Sent: Tuesday, November 02, 2004 1:38 PM
To: docket@energy.state.ca.us
Subject: Notice of Proposed Action - Docket Number 04-AAER-1

To: THE COMMISSION

cc: R. MICHAEL MARTIN, CEC
PTI STANDBY POWER SUBCOMMITTEE
PETER DOMENY, ROBERT BOSCH TOOL CORP.
WAYNE MORRIS, AHAM

Please see attached comments on the proposed regulations.

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