



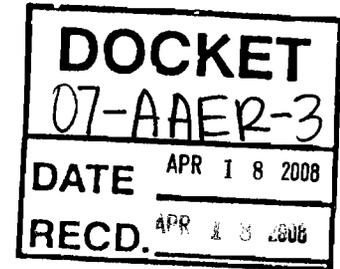
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April 18, 2008

Ms. Jackalyne Pfannenstiel,
Chairman and Presiding Member

Mr. Arthur Rosenfeld
Commissioner and Associate Member

California Energy Commission
1516 Ninth Street
Sacramento, CA 95814



In re: Docket No. 07-AAER-03, 2008 Rulemaking on Appliance Efficiency
Regulations: California Code of Regulations, Title 20, Section 1601 through
Section 1608

Dear Ms. Pfannenstiel and Mr. Rosenfeld,

The Consumer Electronics Association (CEA) is the preeminent trade association promoting growth in the \$161 billion U.S. consumer electronics industry through technology policy, standards, events, research, promotion and the fostering of business and strategic relationships. CEA represents more than 2,200 corporate members. Among their numerous lines of business, CEA members design, develop, manufacture, and distribute consumer electronics that use external power supplies (EPS) and battery charger systems (BCS).

In the above-captioned rulemaking Pacific Gas and Electric Company (PG&E) and its consultant Ecos have recommend that the California Energy Commission (CEC) adopt the Energy Efficient Battery Charger System Test Procedure, version 1.1 developed by Ecos on behalf of PG&E and released March 5, 2008.

We have reviewed the Test Procedure and offer the following comments for your consideration:

- Under the proposed Test Procedure, some products currently regulated as "External Power Supplies" would also meet the definition of a "Battery Charging System." This would result in a double-testing requirement for certain products, which would now be required to be tested as both EPS and BCS. This will add to the cost of the product, which will be passed on to the consumer, and will fail to contribute any additional power savings to the product category.

- The proposed Test Procedure for Battery Charging Systems is not aligned with other internationally-recognized test methods for these products, such as Energy Star or the Canadian Standards Association.
- Many products with a long product lifecycle, such as Public Safety communications equipment, may have been designed several years ago and may not meet aggressive energy efficiency goals. If current product designs are forced off the market, this could result in costly system upgrades for Public Safety agencies, who can no longer procure replacements for system components.
- Although labeling may indicate a broad AC input that includes 115 volt and 230 volt the primary voltage available to consumers in California for consumer products in the household is 115 volt and so testing at 230 volt is unnecessary. The input test voltage should depend on both what the product can safely handle and what is commonly available for the product's use.
- Requiring testing of every possible permutation of a system, including components with identical specifications which may come from different suppliers, will be cost-prohibitive and ultimately limit product interoperability and consumer choice.

We appreciate the opportunity to comment on the Energy Efficient Battery Charger System Test Procedure, version 1.1. We look forward to continued close cooperation during the updating of the Appliance Efficiency Regulations. Please do not hesitate to contact us if you have any questions.

Sincerely,

/s/

Douglas Johnson
Senior Director, Technology Policy & International Affairs

Bill Belt
Senior Director, Technology & Standards