

WAHL®

INNOVATIVE PRODUCTS SINCE 1919

PROFESSIONAL CONSUMER ANIMAL PRODUCTS ELECTRONIC



GREGORY S. WAHL
PRESIDENT & C.E.O.

October 8, 2004

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

Wahl Clipper Corporation is headquartered in Sterling, Illinois and we currently employ approximately 2,200 people worldwide. Wahl Clipper is an international industry leader in the manufacture of products for the professional beauty and barber trade, consumer personal care appliances and animal care. I am writing to you today to request the following:

1. In section 1602 (s), CEC should use the same definition as the EPA Energy Star uses in the final version of the Energy Star Program for Single Voltage External Power Supplies.
2. In section 1602 (s), CEC should exempt certain appliance battery chargers until an **appropriate** test procedure can be developed.
3. In section 1604 (u) (1), CEC should use the latest version of the EPA Energy Star test procedure, and not the February 13, 2004 version.

This proposed program will apply to many of our products, which do not utilize EPS but instead use Battery Chargers (BC) for our cord/cordless shavers and clippers. If implemented on 1/1/06, the program will have a significant negative impact on Wahl Clipper Corporation and our employees here in Illinois.

The current draft of the CEC inappropriately includes certain types of Battery Chargers. As currently drafted, the program's test procedure would measure the efficiency of a Battery Charger on the same scale as an External Power Supply even though they are not the same type of product. The result is that the draft program is biased against one class of product – Battery Chargers, and if it were allowed to go forward in its current form would potentially eliminate a whole class of these products from the market. As a result, the only way for companies like ours to comply would be to use a more expensive Battery Charger (Switch Mode chargers). We estimate that changing the Battery

WAHL CLIPPER CORPORATION

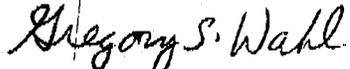
2900 NORTH LOCUST STREET ■ P.O. BOX 578 ■ STERLING, IL 61081-0578
815.625.6525 ■ FAX 815.625.6745 ■ WWW.WAHLCLIPPER.COM

Charger to comply with the CEC draft as written would cost Wahl Clipper approximately \$1,400,000. The result would be an increased cost of \$6.00 to \$10.00 to consumers with very minimal energy savings overall.

In summary, we believe that CEC's current "one size fits all" approach is not appropriate for Battery Chargers and CEC should change the scope of its draft program's test procedure so that these products are exempted. At a later date, we have agreed to work with AHAM to develop a proper test procedure for Battery Chargers, if needed. We are confident that with everyone working together we can develop a program for battery chargers that will not eliminate a entire class of transformers, drive up the cost of products to consumers, and still accomplish the main goal of the CEC which is to reduce energy consumption.

Please contact me if you have any questions.

Sincerely,



Gregory S. Wahl
President and CEO
Wahl Clipper Corporation