California State Public Policy

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DOCKET
05-AAER-1
DATE AUG 31 2005
RECD. AUG 31 2005

August 31, 2005

California Energy Commission
Docket No. 05-AAER-1
Dockets Office
1516 Ninth Street, Mail Station 4
Sacramento, CA 95814

To Whom It May Concern:

I am writing on behalf of our nearly 1,300 high tech member companies in the state of California to issue comments on the California Energy Commission (CEC) proposed regulatory action known to the commission as Docket Number 05-AAER-1, having to do with appliance efficiency.

Advancing the business of technology, AeA is the nation's largest high tech trade association. AeA represents more than 3,000 high tech member companies in the nation, more than 1,400 located in the State of California. Our member companies run the gamut, ranging from software engineering to semi-conductor and component manufacturing, from small start-up companies to large Fortune 500 corporations.

In this proposed action by the CEC, AeA is most interested in the sections pertaining to energy efficiency for external power supplies in section 1605.3 (u) and 1607 (9). Our comments to these sections are provided below.

1605.3 (u) – Power Supply Standards

Despite the fact that our member companies designs incorporate the latest in high efficiency, switching technology, the proposed requirements for power supplies in 1605.3 (u) are not attainable.

Several of our member company power supply manufacturers will be significantly impacted by the pending CEC regulations. One such manufacturer, who manufactures primarily AC-DC power supplies with output power ranging from 5 watts to 150 watts, has just completed a series of tests on all of their standard (off-the-shelf) power supplies. These power supplies, designed over the past 5 years, employ switching regulator technology to deliver output power at very high electrical efficiency. Despite this, every single unit tested failed the new CEC regulations for electrical efficiency or energy consumption under no-load conditions.

We believe the problem stems from the process used by CEC to develop their proposed standards; namely the point where 25% of the currently on the market, available AC adapters already meet the standards. On the surface, this sounds like a good approach. However, when one considers that the vast majority of AC adaptors in the market are cell-phone chargers and laptop computer chargers, this approach skews the results. For example, the cell-phone chargers dominate the requirements for all low power (up to 5W) AC adaptors. Since cell-phone chargers are substantially the same as most other adaptors for that same power level, the CEC regulations for these AC adaptors would be considered

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fair to most of the industry. For higher power AC adaptors, however, the regulations are not fair for the entire industry because they appear to be based on a narrow category (laptop computers) with its own particular requirements. These adaptors which comprise the majority of the market, are mostly driven by size and weight because of portability, and have been driven by efficiency for a long time. In order to achieve their efficiencies, laptop adaptors run at an output voltage of 16V or higher for medium power applications (65W) and approximately 20V or higher for power applications (>90W). But basing the regulations on this group of units is unfair to all other manufacturers of lower voltage power supplies, since power efficiency drops significantly with the output voltage of the power supply. Manufacturers with power supply models delivering 5 volts or 9 volts or 12 volts or 15 volts cannot possibly meet the regulatory efficiency requirement at these lower voltages, despite the fact that their designs incorporate the latest in high efficiency, switching technology. In all fairness, the CEC efficiency figures should be scaled to the output voltage.

With regard to energy consumption in no-load mode, we have another uneven playing field. Specifically, the proposed regulations mirror the no-load demands placed some years ago on AC adapter manufacturers for laptop computers. As such, these manufacturers have been addressing this issue for more than 5 years and over this time period have successfully designed their adapters to meet these standards. However other power manufacturers have almost never been required to meet any no-load regulation and are now suddenly faced with having their standard products meet these same, stringent regulations within a period of less than a year. The imposition of this no-load standard would require many California manufacturers of AC adapters, to redesign their existing product lines over a very short period of time. This is clearly inequitable. If indeed this regulation is a desired objective by CEC, then it should be phased in over a reasonable period of time (years) or, alternatively, grandfather existing (high efficiency, switching regulator) designs from power supply manufacturers and only impose the regulations on new designs starting in 2006.

An additional and critical request for the requirements mandated in 1605.3 (u), we propose that the CEC consider including a service part exemption for equipment sold prior to the effective date. Manufacturers must make service parts available to customers for several years after the end product has gone end-of-life. The CEC must allow an exemption that allows these service parts to be sold to allow manufacturers to honor their contracts with customers, as well as allowing the extension of the end products usable life.

1607 (9) – Power Supply Markings

We propose the CEC remove efficiency marking requirements on power adapters (Roman Numeral III or IV) in 1607 (9). The addition of another marking on an already surface constrained product is a big problem for power adapter manufacturers. Even if an adapter is marked, the only proper way for a regulatory authority (CEC) to audit product compliance is through check testing.

Your consideration of these comments and requests are greatly appreciated. Should you have any questions, please contact me at 916.443.9059 x107.

Thank you,

Christie Henke

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Legislative Advocate