From: Wayne Dieterle <Wayne_Dieterle@conair.com>
To: "'docket@energy.state.ca.us'" <docket@energy.state.ca.us>
Date: 7/28/2005 7:32:19 AM
Subject: FW: CEC Efficiency Requirements for EPS's - CEC- 400-2005-012, Ap ril 2005

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DOCKET
05-AAER-1
DATE JUL 28 2005
RECD. JUL 28 2005

> To Whom It May Concern,
>
> In light of the upcoming requirements for new efficiency requirements for
> external power supplies (EPS) as set forth by the CEC, Conair, as an end
> user of many EPS's for a variety of products sold in California and
> nationally, would like to express our concerns for EPS's that are used
> solely for purposes of charging batteries. When the original regulation
> was written, it attempted to exclude EPS's used for battery chargers. Many
> manufacturers, the EPA and manufacturers groups such as AHAM have been
> working on a separate regulation(s) to cover battery chargers but there
> is currently no provision to exclude battery charging EPS's from the
> existing CEC document reference above. Conair is certainly interested in
> complying with the CEC's requirements but we feel that it is unfair to
> include battery charging EPS's into the current requirements as, it seems
> that the industry and other groups agree that a separate standard for
> battery chargers is in order. While the existing regulations were proposed
> a few years ago, Conair was not aware of this until just earlier this year
> and we would have difficulty to have all our EPS's converted within the
> prescribed date of 7/1/06.
>
> The regulation is designed so that EPS manufacturers would comply and it
> would be almost transparent to the end user, such as Conair, who buys the
> EPS to pack with the end product. Attempts were made by the CEC to notify
> all manufacturers of EPS's so they would comply with the new requirements
> but there are apparently many smaller suppliers that are still not aware
> of these requirements. Most all of Conair's suppliers were not aware of
> these requirements until just a couple months ago and now will be under
> the gun to redesign their products to comply. It would be most helpful to
> have the battery charger EPS's excluded so the suppliers could
> concentrate on the EPS's that are not used as battery chargers. Therefore,
> we respectfully request that changes be made to the requirements to
> exclude battery charger EPS's until an appropriate standard can be
> generated.
>
> Please do not hesitate to contact me if there are any questions or
> concerns regarding the above.
>
> Sincerely,
>
> Wayne Dieterle

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