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December 1, 2008

California Energy Commission
Docket No. 08-AAER-1B
Docket Unit
1516 Ninth Street, Mail Station 4
Sacramento, CA 95814-5504

RE: 2008 Rulemaking on Appliance Efficiency Regulations
Implementation of California Code of Regulations, Title 20, Section 1601-1608

The California Alarm Association (CAA) is a 501(c)6 non-profit trade association representing companies who sell, install and service electronic security and fire/life safety systems throughout the state as well as manufacturers and distributors of these products and services.

The proposed efficiencies are for no-load mode and security and fire systems are never turned off and therefore do not have a no-load mode. The equipment must be active and powered at all times to achieve the safety and security objectives they are designed to address. Even when the equipment is disarmed, it must maintain power to provide security monitoring of the system. In the case of fire systems, the products are designed to monitor the system constantly to ensure safety.

Since these systems are required to be powered at all times, are never off and would not be operated in a no-load mode at any time, making this feature required would have no impact on improving energy efficiency. The proposed regulation would increase the cost to the citizens of California who rely on these systems to enhance their safety and security of their community with no savings of energy or efficiency.

We are requesting that you review the regulations and requirements as they relate to security and fire alarm systems and remove any requirement that these systems have a no-load feature.

We appreciate your consideration.

Jon Sargent, President
California Alarm Association