Digital Monitoring Products

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November 26, 2008

Honorable James D. Boyd
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

Re: Docket# 08-AAER-1B

Dear Commissioner Boyd:

As the Application Solutions Designer located in Pacific Grove California for Digital Monitoring Products, Inc. (DMP) I want to thank the California Energy Commission for giving DMP an opportunity to comment on the draft amendments of the efficiency regulations.

Unlike federal requirements, the draft amendment changes are not limited by the word "consumer" and therefore to a manufacturer of security equipment like DMP there is one definition for addressing the federal requirements, and another definition for the state requirements. The state efficiency requirements would include all power supplies, not just consumer product power supplies. Therefore the security industry that produces/resells product power supplies for Security, Burglary, Alarm, Surveillance, Fire Detection, Intrusion, Access applications is included in the intended coverage of the state efficiency regulation.

There are various requirements for different modes of power supply operation in the efficiency regulation:

- Active Mode (product connected to the power supply and is "on")
- Standby or Off Mode (power supply is plugged into house voltage, but the product is not plugged into the power supply, (such as a cell phone) or the product is connected to the power supply but turned "off").

What sets the security industry apart is that security products are never used in the Standby or Off Mode. Products for "security" applications are Active Mode and always "on" as they always monitor something, and also monitor the power supply for proper operation.

California desires to establish regulations to improve efficiency – a benefit to its citizens. With respect, we believe that there is no benefit realized by imposing efficiency requirements on modes of a power supply that are never used. In addition, the cost of implementing the requirement on an AC-AC 50 Watt transformer for Standby or Off Mode that is never used is considerable. These unnecessary costs would not achieve the desired energy savings in a "security" product. We request to amend the code to remove the non-beneficial requirement for products, such as "security" products, that never use the Standby or Off Mode.

Sincerely,

Lew Kramer

Lew Kramer
Application Solutions Designer

Cb

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