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

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

Comments of Bay Alarm Company:

Bay Alarm Company appreciates the opportunity to submit comments on the proposed amendments to the Appliance Efficiency Regulations. Bay Alarm Company has designed, installed, serviced and monitored security and fire alarm systems throughout California since 1946.

Bay Alarm Company has concerns over the proposed language for external power supplies. The Energy Independence and Security Act of 2007 (EISA) and the Energy Policy Act of 2005 contains federal requirements for external power supplies for consumer products. The Commission now proposes two regulatory requirements for external power supplies:

- Federally regulated for consumer products.
- State regulated for all other products.

The proposed efficiency regulations are for no-load mode. Security and fire alarm systems do not have a no-load mode, as they are never turned off. Even when a system is disarmed, it is still in operation, supervising the twenty-four hour zones for a security system and the entire system if it is a fire alarm. As these systems do not operate in a no-load mode, the proposed standard will neither improve energy efficiency nor decrease load.

The National Fire Protection Association's NFPA 72®, National Fire Alarm Code® and NFPA 731, Standard for the Installation of Electronic Premises Security Systems has no provisions for a no-load mode. These standards do have a provision for "quiescent load", which is the system operating in a non-alarm condition. As stated above, these systems are never off.

Bay Alarm Company supports the Commission's initiatives to reduce load and improve energy and through the National Burglar and Fire Alarm Association (NBFAA) is actively involved in the U.S. Department of Energy Rulemaking on Test Procedures for Battery Chargers and External Power Supplies. We would encourage transparent regulations in the State of California and the U.S. Department of Energy and that it is not in the public interest to set an efficiency standard for no-load mode for state regulated external power supplies for security and fire alarm systems.

Bay Alarm Company is also concerned on the higher price that will have to be paid for these products. Manufactures will be required to produce a California model and a model that would be used in the other forty-nine states.

Bay Alarm Company believes that the simplest way to act in accordance with the charge to establish appliance efficiency requirements where appropriate as set forth in Section 25402 (c)(1) of the Public Resources Code is to add language exempting security and fire alarm (life safety) systems from the definitions for no-load mode. We would suggest adding the following language: "This mode does not apply to power supplies used for security, surveillance, and life safety products that are never used in no-load mode." In addition, Bay Alarm Company suggest that Table U-3 include a footnote that the no-load standard does not apply to security and fire alarm systems that are never used in the no-load mode.

Submitted by:

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Vice President, Codes and Standards Compliance