



power tool institute, inc.

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January 31, 2008

Chairperson Jacqueline Pfannenstiel
Chair, Appliance Committee
California Energy Commission
Sacramento, CA

Mr. Arthur Rosenfeld
California Energy Commission
Sacramento, CA

SUBJECT: California 2008 Appliance Rulemaking Program
Docket 07-AAER-3

DOCKET	
07-AAER-3	
DATE	JAN 31 2008
RECD.	JAN 31 2008

Dear Chairperson Pfannenstiel and Commissioner Rosenfeld:

Thank you for the opportunity to comment on the proposals for product regulations under the 2008 Appliance Energy Standards Program and the opportunity to attend the associated workshop on January 15, 2008.

These comments are made on behalf of the Power Tool Institute (PTI), the North American trade association of the power tool industry and amplify or expand on PTI comments made at the workshop.

To reiterate our long stated position, we support the development of requirements that reflect actual energy savings by the public and do not hamper manufacturer's efforts to find innovative solutions to achieve them.

To this end, we would like to encourage the commission to develop a regulation for appliance battery charging systems (to include power tool battery charger systems) that regulate the excess energy consumed by these systems in anticipated use. We believe that this can be accomplished by establishing use profiles for categories of appliances that include the appropriate proportions of standby, maintenance and recharging operations. Also, we encourage the commission to avoid including elements in the regulation that stipulate particular designs or set limits on individual modes of operation.

We are aware that the commission may be considering battery charging system regulations that cover a broad range of products in addition to appliances. We submit that these products may represent very different concerns than those encountered with appliances and would like to suggest that appliance requirements be developed independently from those for other product categories.

It is also noted that there a number of efforts underway or contemplated by various jurisdictions to develop energy consumption requirements for battery charging systems. We are concerned that these various jurisdictions may be developing approaches that are different or even contradictory.

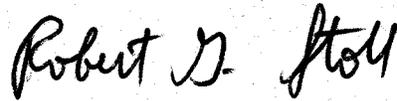
Based on these concerns, PTI offers to work with CEC staff, in conjunction with stakeholders from other jurisdictions, to develop requirements for appliance battery charging systems that will be acceptable across various jurisdictions.

It was reassuring that, during the workshop, the Commission restated comments that were made during earlier meetings that regulations would not be promulgated that would require battery charger systems that used separate enclosures (such as those provided with wall adapter) to meet both requirements.

With respect to test methods, we believe that any test method that provides the data required by the regulation can be adequate for the purpose.

Again, we thank the Commission for the opportunity to voice our comments on this important topic.

Sincerely,

A handwritten signature in black ink that reads "Robert D. Stoll". The signature is written in a cursive style with a large, stylized "S" at the end.

Robert Stoll, Technical Director
Larry Albert, Battery Committee Chairman