

CUSTOM
ELECTRONIC
DESIGN &
INSTALLATION
ASSOCIATION

DOCKET

07-AAER-3

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January 19, 2009

Mr. Arthur H. Rosenfeld
Presiding Member, Efficiency Committee
CALIFORNIA ENERGY COMMISSION
1516 Ninth Street
Sacramento, CA 95814

Re: Docket No. 07-AAER-3C
2008 Rulemaking Proceeding on Appliance Efficiency Regulations

Dear Mr. Rosenfeld:

Thank you for the opportunity for the Custom Electronic Design & Installation Association (CEDIA) to be a part of the conversation and comment on the California Energy Commission's (CEC's) 2008 Rulemaking Proceeding on Appliance Efficiency Regulations, specifically *Draft Efficiency Standards for Televisions* following our participation in the recent CEC workshop held on December 15, 2008.

CEDIA is an international trade association of companies that specialize in planning and installing electronic systems for the home. These systems include home networking, home automation and communication systems, media rooms, single or multi-room entertainment systems, and integrated whole-house subsystems providing lighting control, security, and heating, ventilation & air conditioning (HVAC) systems.

CEDIA Members include residential electronic systems contractors, manufacturers, industry-related professions, professional services, distributors, and sales representatives and currently include nearly 550 member companies and tens of thousands of professionals who work in the residential electronic systems industry in California.

Both electronic systems contractors and manufacturers are working to make more energy-efficient products available for customers and continue working with customers to integrate and install energy-efficient products and solutions in the home.

The CEC's Staff Draft Report proposal for a fixed energy use limit on televisions, which would remove a significant share of televisions from the market, threatens both California consumers and California-based CEDIA Members by limiting their choice of large-screen televisions best suited for home theater environments. As was stated by stakeholders at the December 2008 CEC workshop, there are successful programs already in place that encourage television energy efficiency, and there are several alternative approaches that avoid the negative financial and economic impacts of the Commission's draft proposal.

Impact on the Residential Electronic Systems Industry

Most CEDIA Members are small, independent electronics specialists with a strong entrepreneurial spirit. These companies are referred to as electronic systems contractors, which install and integrate technology in the home. The large, high-performance television is often the entry point for consumers into this market, and our members also work with these customers to suggest complementary products and services and integrate these televisions throughout the home with supporting systems, including lighting control, occupancy and motion sensors, automated window treatments, HVAC control and energy management. To further illustrate how electronic systems contractors continue to involve energy-efficient practices in their work, many CEDIA Members have also begun installing solar panels to help with a home's energy management.

CEDIA strongly believes a mandated proposal to eliminate 25% of the televisions from California would seriously impact the business model electronic systems contractors operate under. Furthermore, if this mandate is implemented, the proposed efficiency standard for televisions would impact all segments of the residential electronic systems industry.

The large, high-performance television is a vitally important product offering for electronic systems contractors, many of which are independent specialty retailers. The television often begins the conversation, which leads to other opportunities for electronic systems contractors to offer additional energy-efficient solutions in the home.

Televisions are valued by consumers and represent an important part of the consumer electronics industry. As the centerpiece of a home theater, the installation of large-screen, flat-panel televisions is a significant business opportunity in our electronic systems contractor and distributor members' business models. High-performance television distribution is relatively more concentrated within this channel of independent electronic systems retailers, technicians and specialty distributors.

By restricting the television product mix in the State of California, the Commission also would be restricting the services electronic systems contractors could provide their customers in the State of California.

Without a mandate, our members are working daily to meet their customers' desire for their homes to become more energy-efficient. Some of these energy-efficient services electronic systems contractors offer are:

Video Calibration

One way electronic systems contractors already work for energy efficiency in televisions is through video calibration. Video calibration refers to the process of adjusting and aligning the technical parameters of video equipment to conform to standard specifications. Video calibration gets the video equipment to the "starting line" of how the content is intended to be viewed. Video calibration is especially important since televisions shipped from the manufacturer are set to impress customers in a retail showroom. This calibration is not ideal for everyday viewing. The first three steps of video calibration - setting the black level (brightness), setting the display gain (contrast) as well as adjusting backlight levels on LCDs and setting the color level - can significantly reduce the amount of energy used by a television and can also extend the life of the television.

Lighting Control

Automated lighting control is gaining in popularity because it not only provides safety and convenience for home owners, but also adds to energy efficiency.

Because it is key to the home environment, lighting control is now a central application in most of the new solutions for home automation and energy management. An electronic systems contractor can automate the homeowner's lights to turn on and off based on occupancy and usage. In addition to energy savings, the convenience of having lighting adapt to activities enhances the lifestyle of the home owner.

Dimming is an important part of lighting control and another great way to save energy. Dimming light bulbs by just 10%, while hardly noticeable to the human eye, can reduce energy consumption by 10% and double the life of the bulbs. The life of bulbs, outdoor bulbs in particular, can be dramatically increased by a gradual ramp-up instead of the sudden surge of a light switch. Extending the life of light bulbs means fewer bulbs being produced and fewer being thrown away.

Occupancy & Motion Sensors

Occupancy sensors can activate and deactivate a number of loads, including lighting. Occupancy sensors provide light when needed and save energy when

rooms are unoccupied. Occupancy sensors are perfect for interior pathways and exterior lighting areas that require illumination only when someone is present.

A new generation of simple devices is changing residential energy management. For example, daylight and motion sensors are now inexpensive and accessible, and can work in concert with other networked devices throughout the home. This provides residents with automated energy management that can be tailored to extremely precise levels, with lighting and HVAC adjusting themselves in real time to changing environmental conditions.

Automated Window Treatments

Automated window treatments and an astronomical clock sensor can add tremendously to the ability of a house to regulate the amount of energy used. Window treatments can be used in conjunction with the HVAC system to block out the sun in the heat of the summer, or allow its warming effects in the winter. Opening and closing window treatments can dramatically reduce the work that the home owner's climate control systems have to do.

By controlling window shades, drapery tracks, and skylight shades, homeowners can reduce glare and solar heat gain, which reduces cooling costs. Window shades also provide the benefit of protecting the furniture and carpet from damaging UV rays.

Daylight sensors control the lights and shades in the home by taking advantage of the available sunlight. The sensors balance the amount of electric light and daylight, saving energy and maintaining a constant level of light in the room. This concept is known as daylight harvesting.

HVAC Control

HVAC controls are another programmable technology that can help increase energy efficiency while also enabling home owners to enjoy their home environments more.

Electronic systems contractors can program the homeowner's thermostat to adjust based on occupancy schedules. Remote access can also allow the homeowner to adjust heating or air conditioning in anticipation of a change in schedule.

Electronic systems contractors work to integrate technology that fits a homeowner's lifestyle and also allows them to be more energy-efficient. Home automation helps tie all these technologies together and helps give people control of their home and conserve resources like energy.

Conclusion

CEDIA supports manufacturer and retailer participation in energy efficiency programs such as the EPA's ENERGY STAR program and our members' continued work toward energy efficiency and savings solutions. CEDIA continues to work with its members through the association's Green Task Force and Technology Council to help research processes and procedures for developing energy-efficient products for tech-savvy consumers.

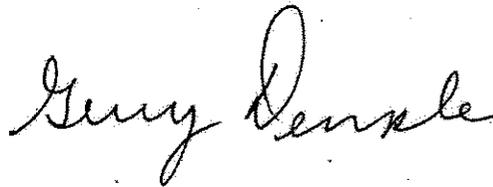
CEDIA urges the CEC to recognize and further support the programs already in place, such as ENERGY STAR, which are very successfully encouraging energy efficiency in televisions and other high tech products. CEDIA also strongly encourages the CEC to take steps to fully understand the residential electronic systems industry and the consumer electronics industry before implementing any approaches that can significantly impact these technology-based industries.

CEDIA will be happy to work with CEC staff to set up site visits and other meetings with other industry stakeholders including CEDIA Member companies in the Sacramento area for the Commission to learn about the residential electronic systems industry and to increase the Commission's awareness and understanding of programs, practices and approaches already in place. Thank you for your time and consideration. CEDIA looks forward to continuing to work with the California Energy Commission and staff on these issues.

Respectfully submitted,



Ken Erdmann
Chairman of the Board
CEDIA



Gerry Demple
Chairman, CEDIA Government Affairs &
Public Policy Action Team

Cc: Utz Baldwin
Chief Executive Officer
CEDIA