PHILIPS

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March 23, 2006

Ms. Jackalyne Pfannanstiel
Vice-Chair
California Energy Commission
1516 Ninth Street
Sacramento, California 95814-5512

DOCKET
06-AAER-1
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Mr. Arthur H. Rosenfeld
Commissioner
California Energy Commission
1516 Ninth Street
Sacramento, California 95814-5512

Re: Comments on Docket Number 06-AAER-1 Proposed Amendments to Appliance Efficiency Regulations

Philips Electronics wants to express its appreciation for the proposal of the California Energy Commission to delay the effective date of regulations regarding external power supplies and digital television adapters and to make other changes in the regulations regarding consumer electronic products. Philips Electronics makes consumer electronic products and personal grooming appliances using battery chargers that would be affected by the regulations. We appreciate the Commission's willingness to review this issue as requested both by AHAM and CEA and to make some modifications in the existing requirement.

At the same time, however, we are disappointed that the Commission did not fully adopt the proposals made both by AHAM and CEA. We are particularly disappointed that the Commission did not agree to separate battery chargers from the external power supply standard. Since the Commission did not identify the reasons for not adopting our recommendations it is difficult to respond other than to restate our requests and the reasons for those requests.

Both AHAM and CEA are providing detailed comments and we will not repeat them. We do want to highlight one issue regarding battery chargers that we thought the Commission understood at the hearing but was not addressed by the Commission's proposed action.

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For most models of Philips' Men's Shavers, Beard Trimmers, Lady Shavers, and Epilators there is no charging station – the batteries are recharged through a direct connection between the product and outlet. As a result, there is no standby power loss for these products.

The only maintenance power for the products without a charging station would occur when the product is plugged into the outlet for recharging and the battery is recharged before the consumer unplugs the product. The Instructions Manual for all such products (which we can provide upon request) advises consumers to unplug the product after recharging. An average men's shaver charge lasts two weeks (14 shaves). That means it only is charged 26 times a year. Other products' battery charge lasts much longer because they are used less frequently than men's shavers that likely are used on a daily basis. So maintenance power losses for products without charging stations/stands are limited to the number of recharges/year and the length of time the product is connected to the socket after recharging. (Not recommended by manufacturer and usually not convenient for consumer).

Even for those shaver products with a charging station the Instructions Manual repeatedly advised the consumer not to leave the station plugged in except for recharging. This is recommended to reduce the risk of electrical shock from the appliance or charging stand falling into a tub or sink and to extend battery life.

Since these products are normally used in a bathroom setting where there are limited electrical outlets and space for appliances, common sense suggests and our survey experience shows that is that very few people leave personal appliance products plugged into electrical outlets.

Personal grooming products, therefore, have little or no standby power use and very minimal maintenance power use. Section 25402 of the Public Resources Code authorizes the Commission to establish:

> "standards for minimum levels of operating efficiency, based on a reasonable use pattern,..to promote the use of energy efficient appliances whose use, as determined by the commission, requires a significant amount of energy on a statewide basis… The standards shall be drawn so that they do not result in any added total costs to the consumer over the designed life of the appliances concerned."

Philips does not understand how the Commission can set a specification for such products and be consistent with its guiding principles of achieving significant energy savings potential based on reasonable use patterns with a reasonable payback.

Addressing this issue could occur if the Commission were to follow the AHAM recommendation to remove battery chargers from the EPS standard and establish a separate energy charger standard. If the Commission chooses not to follow this course then we would recommend that the Commission exempt intermittent use products such as personal grooming appliances from the EPS standard because of the lack of energy savings and failure to have a positive return from applying the standard to these products.

Sincerely,

Ric Erdheim