

AHAM

Discussion with CEC

January 30, 2006

Current CEC EPS Standard

- Has requirements on the efficiency of charging.
 - Appliance Battery Chargers spend 17% of their time or less in charging
- Has requirements on stand-by power limits
 - Appliance Battery Chargers rarely, if ever, spend time in stand-by mode.

External Power Supplies

- Some appliance battery chargers spend 61% of their time in “maintenance mode”
- But the CEC EPS test procedure does not currently measure this.
- The proposed Ecos test procedure does address this.

Current EPS Standard

- This standard does not properly address many inductive charged devices
- This standard does not properly address cord/cordless products
- And, it does not properly address some smaller, low-power products.

Current CEC EPS Requirement

- Meeting the EPS Requirement:
 - Will not save sufficient energy
 - Will cost consumers far beyond any savings

Possible Savings

- For 3-5 Watt Appliance Battery Chargers the savings using CEC's EPS Standard would be 0.274 kwh/yr
- At even \$0.20/kWh, this a savings to consumers of \$0.05/year. In 5-7 yrs, \$0.35.
- While cost increases will likely be more than \$1.00, more than \$2.00, depending on models

AHAM's Promise

- We made a promise to CEC
- We agreed to work with EPA Energy Star on a specific Test Procedure for Appliance Battery Chargers
 - **Completed**
- We agreed to work with EPA Energy Star on a specification for Appliance Battery Chargers
 - **Completed**

Our Request

1. Give us time to resolve the CEC Appliance Battery Chargers Test Procedure
2. Give us time to work together with CEC on appropriate Appliance Battery Charger Standards Levels

We get it

- We understand the need for standards for Appliance Battery Chargers

A Correct Battery Charger Standard

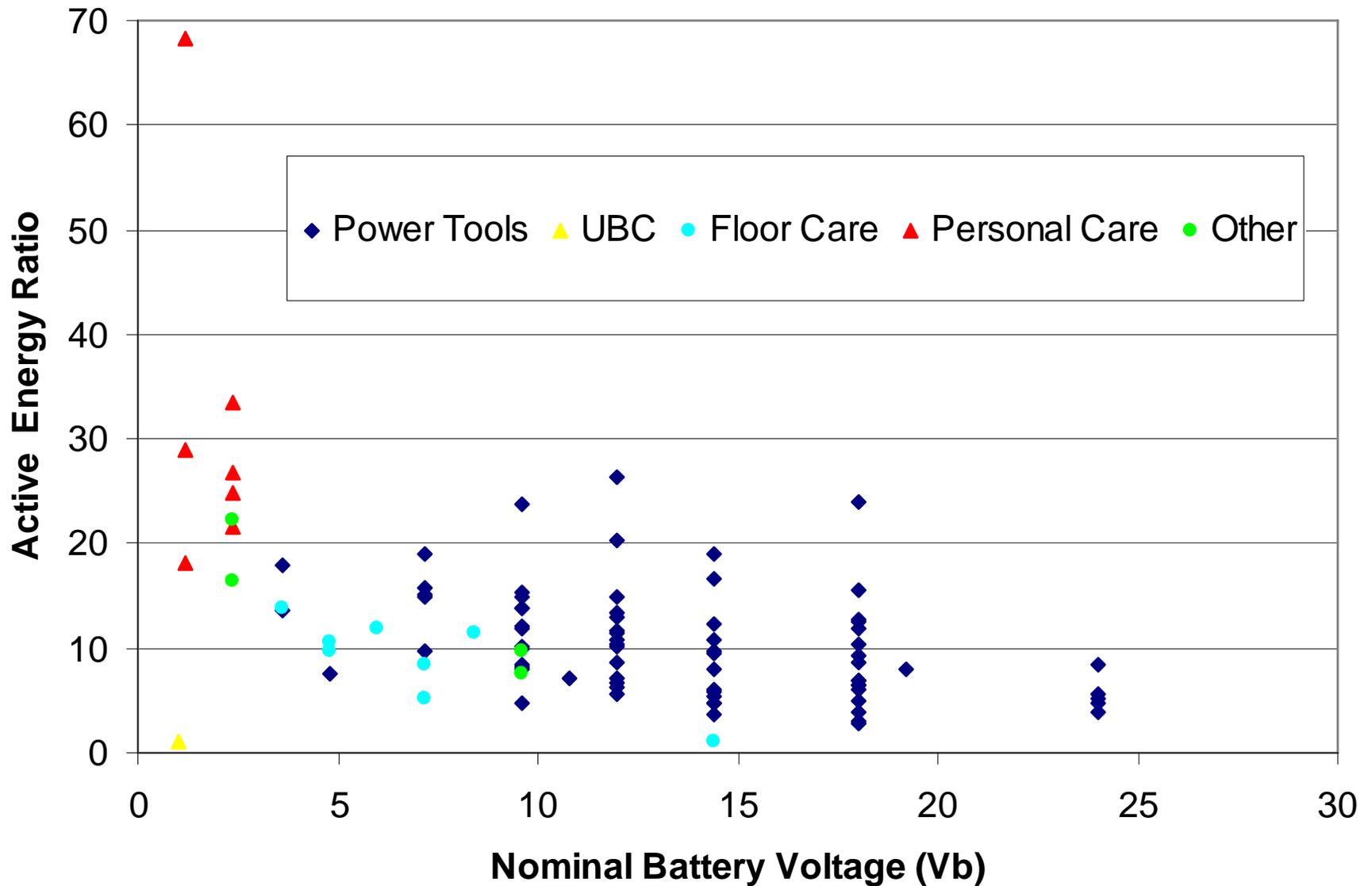
- By adopting a standard within one year, we are confident we can save more energy in a reasonable time period than will be lost by any delay.

- There are some unique products
 - Products with virtually no stand-by power
 - Products with no or very low maintenance mode energy
 - Products with multi-port, multi-level
 - We can work on this.

Appliance Battery Chargers are unique

- Not off the shelf
 - Safety issues are paramount
 - Some products require medical listing—more than 1 year to obtain regulatory approval
 - Designs are integral to the product
- Costs are very volume dependent

We have the data on these products.



You asked...

- For certain products, today's EPS standard
 - Restricts products for which no compliant appliance battery charger exists
 - Requires severe cost penalties on consumer retail products
 - Causes production disruptions
 - Meet 7/1/06 Standard
 - Then, meet some future CEC BC Standard

You asked...

- Are specific standards requirements for specific consumer products not feasible? Why are they not feasible? How could they be revised to be feasible?
- **Standards for appliance battery chargers are not feasible to be met in many cases. The standards for external power supplies are built around constant voltage power supplies and supplies that have some considerable time period in “stand-by” mode. This is not appropriate for appliance battery chargers, where the issue is “maintenance mode” not “stand-by mode.” Several types of appliance battery chargers do not have feasible alternatives to meet the EPS requirements. Alternatives may not exist for low power appliance battery chargers (Under 2.4 volts, under 3 Watts) and for inductive charger devices. In addition the test procedure does not adequately test cord/cordless products.**

You asked...

- Should battery chargers (those covered by the Energy Star specification) be exempted from the external power supplies standard, and a new efficiency standard for those battery chargers be created?
- **Yes, we believe Appliance Battery Chargers should be exempt from the EPS standard. Instead we should have a meaningful and correct Appliance Battery Charger Standard.**

You asked...

- Should the Energy Commission create a new efficiency standard for products covered by the EnergyStar battery charger specification?
- **Yes, we have data on these products which can assist and speed the process. Many issues have been addressed.**

You asked...

- Should the Energy Commission create a new efficiency standard for all battery chargers (including those not covered by the Energy Star specification)?
- **AHAM has no comment on this issue other than to say that if the CEC should adopt a new energy efficiency test procedure and standard, that it should take into account the differences in product and not force one and only one type of test procedure.**

If the CEC will dedicate the staff resources, AHAM believes we can have a meaningful Appliance Battery Charger Test Procedure and Standard in place by end of 2006. We can implement by 1/1/08.

The situation is Urgent. We ask that you try to give our manufacturers an answer within 10 days.

All we ask...

- Is to give us time...
 - Delay the EPS Standard for APPLIANCE BATTERY CHARGERS by 12-18 months.