



# CEA Position Summary



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- On behalf of CEA's 2,000+ member companies, appreciate opportunity to participate in today's workshop
- California's new energy efficiency standard as applied to our products will greatly impact
  - Consumers
  - Manufacturers
  - Retailers
  - And to a lesser extent, California's energy supplies



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# Net Result of Regulations

- Instead of saving megawatts of energy, the regulations will potentially:
  - Reduce consumers choice with some popular products withdrawn from CA market
  - Force manufacturers to offer less featured products to California consumers
  - Lead to higher costs for popular products
  - Diminish the long-term effectiveness of the ENERGY STAR program



# A Better Solution

- CEA member companies want to contribute to energy savings for all Californians
- Can be achieved through a concerted joint public-private effort
- Instead of promulgating regulations based on now outdated data, we propose to work closely with CEC staff to develop a more realistic approach



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# Why Rework the Regulations?

- Industry shares CEC's mandate that efficiency standards must be feasible and cost-effective
- Current regulation in place does not meet these criteria
- Industry **will** work with CEC to “get it right” and develop standards that help meet vital public policy goals and benefit consumers



# EPS Regulation

- Current EPS regulation takes an unproven voluntary specification and makes it state law
  - Does not allow for functional limitations at low no load power consumption
  - Ignores technical development realities
  - Overlooks supply chain constraints including single source suppliers
  - Does not factor in “time to market” needs

# Finding a Better Way

- In light of these problems, CEA advocates:
  - Delay Tier I effective date to July 1, 2007
    - CEA will work on ongoing basis with CEC staff to develop more feasible workable EPS regulations
  - Remove the 230 Volt test requirement
  - Exempt infrequently used products where potential energy savings are minimal
  - Exempt products where safety and reliability considerations are threatened



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# Finding a Better Way

- CEC also should consider impact regulations could have on ENERGY STAR program
  - Will create diminished manufacturer participation in ENERGY STAR resulting in potential greater overall energy consumption



# Two Visions for California

- One we hope doesn't come to pass



# Two Visions for California

- One we all hope to achieve for California

