



December 12, 2013

Ann Bailey, Chief
ENERGY STAR Labeling Branch
US Environmental Protection Agency
Ariel Rios Building
1200 Pennsylvania Avenue, N.W.
Washington, DC 20460

Dear Ms. Bailey:

This letter comprises the comments of the Pacific Gas and Electric Company (PG&E), Southern California Gas Company (SCGC), San Diego Gas and Electric (SDG&E), and Southern California Edison (SCE) in response to the Environmental Protection Agency (EPA) battery charging system (BCS) sunset proposal memo.

The signatories of this letter, collectively referred to herein as the California Investor Owned Utilities (CA IOUs), represent some of the largest utility companies in the Western United States, serving over 35 million customers. As energy companies, we understand the potential of appliance efficiency labeling to cut costs and reduce consumption while maintaining or increasing consumer utility of the products. We have a responsibility to our customers to advocate for specifications that accurately reflect the climate and conditions of our respective service areas, so as to maximize these positive effects.

We support EPA's decision to sunset the BCS specification as it currently stands for the following reasons:

- The specification only covers a relatively small subset of all BCSs covered by the California Energy Commission mandatory standard.
- The specification does not comprehensively address the efficiency of battery chargers, as it does not include provisions for active mode efficiency.

However, we recommend that EPA maintain the BCS programmatic area in anticipation of the release of the U.S. Department of Energy final BCS rule. Depending on the approach taken by the US DOE, there may remain important energy savings opportunities that the EPA could address with the ENERGY STAR labeling program. At this point, there is significant uncertainty as to the stringency and coverage of the federal standard that makes a characterization of the full savings opportunities difficult at this time. Possible areas of focus for a future ENERGY STAR BCS program could include wireless charging in dry environments and commercial and industrial chargers, among others. In addition, there may be additional cost-effective methods to reduce energy use across many BCS categories, such as improved power supply efficiency and power factor correction.

In conclusion, we support EPA's sunset of the current specification but encourage EPA to maintain the BCS program so that it can evaluate the full savings opportunity of these products after the DOE final rule is released. We thank EPA for the opportunity to be involved in this process and encourage EPA to carefully consider the recommendations outlined in this letter.

Sincerely,



Patrick Eilert
Pacific Gas and Electric Company



Lance DeLaura
Southern California Gas Company



Steve Galanter
Manager, DSM Engineering
Southern California Edison



Chip Fox
Residential Programs and Codes & Standards
Manager
San Diego Gas and Electric Company