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WAHL

March 20, 2006

Ms. Jackalyne Pfannenstiel
Vice Chair
Presiding Member, Efficiency Committee
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512

Mr. Arthur H. Rosenfeld
Commissioner
Associate Member, Efficiency Committee
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512

RE: Comments Regarding Docket No. 06-AAER-1 Proposed Amendments to Appliance Efficiency Regulations.

On behalf of Wahl Clipper Corporation (Wahl), we would like to thank the California Energy Commission (CEC) for its proposed amendments to delay the effective date for the minimum efficiency standards of single voltage external power supplies to January 1, 2007, and to exclude specific medical devices from its appliance efficiency regulation. Based upon additional analysis and research on the subject of compliant battery chargers for Wahl's 1.2-volt appliances, Wahl hereby requests a further delay in the effective date of the CEC's test procedure and energy efficiency standard for External Power Supplies (EPS) until July 1, 2007. In addition, we would ask the CEC to work with the small appliance industry in developing a new battery charger standard to include the exempting of appliance battery charger products that operate at less than 2 watts of energy in the maintenance mode.

Delay of the Regulation

Wahl requests the California Energy Commission (CEC) to delay the effective date of the CEC's test procedure and energy efficiency standard for External Power Supplies (EPS) until July 1, 2007. Our reasons for this request are as follows:

1) EPS regulation does not address appliance battery charger issues in different charge modes

2) There are no off-the-shelf compliant appliance battery chargers for Wahl's 1.2-volt appliances. All switch mode supplies start at 3.0 volts or higher. Wahl currently sells 18 products that will not be compliant with current CEC regulations and we have no immediate alternatives at this time to meet the regulation. Wahl has shared information with the CEC on this issue. In addition, Wahl has provided the CEC with copies of correspondence from vendors that had previously informed the CEC they offered compliant product, but when asked about the 1.2-volt issue, the same vendors could not provide Wahl compliant samples. Vendors have advised Wahl that they may have a working design by June 2006. If indeed a design is available and if it works, our schedule remains very tight to meet the CEC's January 1, 2007 date. Please remember our internal circuitry must be changed, our products require performance testing and we must submit the Wahl products affected to UL for approval. Lastly, Wahl requires sufficient time to order components and build compliant product.

3) A delay will provide the CEC and the industry time to effectively work together to establish meaningful appliance battery charger requirements. By the CEC granting a one-year delay, the California consumer will not see an interruption in product availability and the State of California will realize lower energy usage by working with the industry.

Exempt Low Voltage Battery Charger Products

Wahl requests the CEC to exempt appliance battery charger products that operate at less than 2 watts of energy in the maintenance mode in the new battery charger standard. Wahl believes the Statutory Requirements detailed in the California Code of Regulations – Notice of Proposed Action will not be met under the CEC's appliance efficiency regulations when considering low wattage products. Our position is as follows:

1. Wahl's research dealing with the recharging habits of consumer products indicates our products are recharged once every three weeks, usually overnight. This means our product is not plugged in and charging 99% of the time. Wahl believes low voltage products that are recharged infrequently do not use a significant

amount of energy. California law requires that the Energy Commission's appliance efficiency standards (1) apply to appliances that use a significant amount of energy on a statewide basis.

2. Inquiries into actual costs from our vendors of changing linear battery chargers to a switch mode charge on products less than 2 watts indicate the retail costs to the California consumer will outweigh the projected savings in energy costs. Our vendors have told us that the 1.2-volt application with high current will be difficult to design requiring special components. Wahl believes our costs will increase from $1.50 to $2.50 while the cost to the consumer in California may surpass $4.00 to $6.00. Our estimate of savings of a compliant battery charger to the California consumer is $0.59 over a five-year period. *Please note these costs are estimates as Wahl does not have final costing on low voltage compliant battery chargers as no off-the-shelf product is available. California law requires that the Energy Commission's appliance efficiency standards (3) be cost-effective based on a reasonable use pattern (i.e., not result in added total costs to the consumer, considering both any increased costs of the efficiency improvement and the reduced utility bill costs resulting from the improved efficiency, over the design life of the appliance.)

3. Other industry contacts at the workshop indicated that vendors would have difficulty meeting the CEC's efficiency requirements in the lower wattages due to technological limitations. We have found this to be true from our own inquires. The CEC's consultant, Ecos, showed these lower voltage switch mode power supplies do not exist. Although our suppliers are working on designs, as of today, none exist that meet the requirements of the CEC. California law requires that the Energy Commissions appliance efficiency standards (2) be based on feasible and attainable efficiencies or feasible improved efficiencies.

Finally, if Wahl does find acceptable battery charger alternatives, we estimate Wahl would spend $12,000-$18,000 per product for new safety certification approvals. We have 18 different products that will be affected costing our company in a range of $216,000-$324,000. This cost is a hardship on our family owned and operated company - one of the last U.S.-based manufacturers of personal care appliances.

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Again, we thank the CEC for the opportunity to address these issues. Wahl will continue to work effectively with the CEC and our industry advisor, the Association of Home Appliance Manufacturers (AHAM), in developing more efficient appliance battery chargers for our products.

Thank you for your consideration.

Sincerely,

Michael C. Fliss
Vice President

Rick Habben
Compliance Engineer

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