

July 16, 2012

The Honorable Steven Chu
U.S. Department of Energy
Building Technologies Program
1000 Independence Avenue, SW
Washington, DC, 20585

RE: Battery Charger and External Power Supply Rulemaking: **Docket Number EERE-2008-BT-STD-0005** and **Regulatory Information Number (RIN) 1904-AB57**.

Dear Secretary Chu:

As a broad coalition of energy efficiency, environmental, and public interest organizations, consumer groups, and energy providers, we ask DOE to strengthen the proposed efficiency standards for battery chargers. DOE's initial proposal sacrifices hundreds of millions of dollars in energy savings and seriously risks increasing national energy use and greenhouse gas emissions compared to simply permitting state standards to continue to exist.

With the precipitous rise in the number of electronic products, there has been a corresponding increase in the number of devices containing rechargeable batteries (i.e. "battery chargers"), including devices as diverse as portable phones, power tools, toothbrushes and notebook computers. The quantities are stunning: There are approximately 1.6 billion battery chargers nationwide (an average of 14 per household) and another 450 million are sold in the U.S. every year. With this high volume, even a small amount of wasted energy per product has an oversized impact on our nation's energy use.

After a thorough rulemaking process, California adopted state level efficiency standards for battery chargers in early 2012, finding that the consumer bill savings from the new standards would outweigh costs by a factor of seven to one. DOE's proposed standards are significantly weaker than the California standards for most battery chargers. Some manufacturers have indicated that, if not preempted by weaker DOE standards, the California standards would become *de facto* national standards. Moreover, other states may adopt the California standards. Therefore, DOE action to preempt the existing state standards with weaker federal requirements would most likely increase energy use nationwide.

If DOE adopted standards similar to the existing California standards for the major product classes, consumers and businesses would save an additional \$400 million on their energy bills in 2020 alone relative to DOE's proposed rule and CO₂ emissions would be reduced by an additional 1.6 million metric tons in 2020. Cumulative national energy savings would double to nearly two quads (the amount of energy consumed annually by all the households in Florida and Georgia combined) and additional cumulative CO₂ emissions reductions would total over 50 million metric tons (equivalent to the annual CO₂ emissions of 12 power plants).

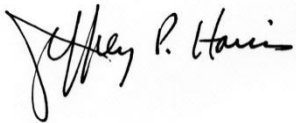
In closing, we strongly urge DOE to finalize new battery charger standards that would save at least as much energy as the California standards. Alternatively, DOE should allow the existing state standards to

stand. Under no circumstances should national “energy efficiency” standards be allowed to *increase* energy use and greenhouse gas emissions. Thank you for considering these comments.


Sincerely,



Steve Nadel, Executive Director
American Council for an Energy-Efficient Economy



Jeffrey Harris, Senior Vice President for Programs
Alliance to Save Energy



Andrew deLaski, Executive Director
Appliance Standards Awareness Project



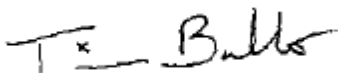
Pierre Delforge, Senior Engineer
Natural Resources Defense Council



Mel Hall Crawford, Special Projects Director
Consumer Federation of America



Stephen L. Crow, Executive Director
Northwest Power and Conservation Council



Tim Ballo, Senior Associate Attorney
Earthjustice



Robert Sargent, Energy Program Director
Environment America



David S. Hamilton, Director of Global Warming and Energy Programs
Sierra Club



Seth Kaplan, Vice President for Policy and Climate Advocacy
Conservation Law Foundation



Thomas J. Coughlin, Jr., Lead Strategy Analyst, Energy Efficiency
National Grid



Dave Robertson, Vice President, Public Policy
Portland General Electric



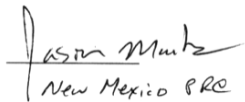
Jorge Carrasco, Superintendent
Seattle City Light



John F. Savage, Commissioner
Public Utility Commission of Oregon



Tony Usibelli, Director of Washington State Energy Office
Washington State Department of Commerce



Jason Marks
New Mexico PRC

Jason Marks, Commissioner
New Mexico PRC



Patrick J. Oshie, Commissioner
Washington Utilities and Transportation Commission



Jay Wrobel, Executive Director
Midwest Energy Efficiency Alliance



Mandy Mahoney, Vice President
Southeast Energy Efficiency Alliance



Howard Geller, Executive Director
Southwest Energy Efficiency Project



Sara Patton, Executive Director
NW Energy Coalition



Howard Learner, Executive Director
Environmental Law & Policy Center



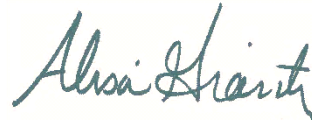
Daniel Sosland, Executive Director
Environment Northeast



Dr. Stephen A. Smith, Executive Director
Southern Alliance for Clean Energy



Carol Werner, Executive Director
Environment and Energy Study Institute



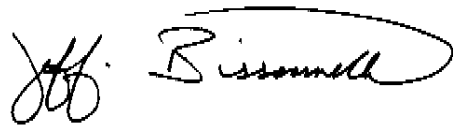
Alisa Gravitz, Executive Director
Green America



Susan Stephenson, Executive Director
Interfaith Power and Light

(Digital signature on file)

Dorothy Barnett, Executive Director
Climate + Energy Project (Kansas)



Jeff Bissonette, Organizing Director
Citizen's Utility Board of Oregon



Stan Price, Executive Director
Northwest Energy Efficiency Council



Diane E. Brown, Executive Director
Arizona PIRG (Arizona Public Interest Research Group)



KC Golden, Policy Director
Climate Solutions



Tommy Landers, Director
Environment Maryland



Rob Garrity, Executive Director
Mass Climate Action Network



Jim Jensen, Executive Director
Montana Environmental Information Center



Montelle Clark, Director
Oklahoma Sustainability Network



Sarah Wright, Executive Director
Utah Clean Energy



Scott Johnstone, Executive Director
Vermont Energy Investment Corporation

A handwritten signature in blue ink, appearing to read "Jim A. Merriam".

Jim Merriam, Director
Efficiency Vermont

Cc:

Dr. David Danielson, Assistant Secretary for Energy Efficiency and Renewable Energy

Dr. Kathleen Hogan, Deputy Assistant Secretary for Energy Efficiency

Roland Risser, Program Manager, Building Technologies Program

Brenda Edwards, Building Technologies Program