



## Consumer Federation of America

1620 I Street, N.W., Suite 200 \* Washington, DC 20006

May 8, 2013

California Energy Commission  
Dockets Office, MS-4  
Re: Docket Nos. 12-AAER - 2A, 2B, 2C  
1516 Ninth St.  
Sacramento, CA 95814-5512

RE: CEC's Invitation to Participate in the Development of Appliance Energy Efficiency Measures

Dear Commissioners,

Consumer Federation of America (CFA) is pleased to respond the California Energy Commission's March 25, 2013 Invitation to Participate in the development of appliance energy efficiency measures as a result of the Commission's Order Instituting Rulemaking (OIR) issued on March 14, 2012. In general, we support the Commission's action to undertake this process for all the products listed in the proceeding.

By way of background, the Consumer Federation of America is a non-profit association of more than 260 consumer groups from across the country, including California, that was established in 1968 to advance the consumer interest through research, education, and advocacy. We have long supported energy efficiency measures on the premise that, over the long run, they save consumers money through lower energy costs.

On the federal level, over the past 15 years, we have advocated for higher energy efficiency standards for a host of residential consumer products such as: central air conditioners and heat pumps, furnaces, and water heaters. We supported and are awaiting action by the Department of Energy on federal standards for battery chargers and external power supplies, well aware that California has led the way on this front with a standard for consumer chargers that has already gone into effect. We were a party to the 2010 consensus agreement between manufacturers and efficiency, environmental and consumer advocates on federal standards for a number of products. In March 2011, CFA testified before the Senate Energy Committee in support of implementing legislation (S.398, Implementation of National Consensus Appliance Agreements Act of 2011 .)<sup>1</sup> Our testimony also included two reports we issued: 1) 'Public Attitudes Toward Energy Efficiency and Appliance Efficiency Standards: Consumers See the Benefits and Support the Standards' and 2) 'Market Imperfections and the Energy Efficiency Gap, Why Standards are the Right Approach.'

In California, we advocated for the Clean Cars Program before the Air Resources Board as reduced vehicle emissions from motor vehicles also results in greater fuel economy and thus, lower gasoline costs for consumers. We also did extensive analysis and public opinion polling on the benefits of higher fuel economy standards and submitted detailed comments for the record to the U.S. Environmental Protection Agency and the U.S. National Highway Transportation Safety Administration showing consumer support for higher standards and providing our economic analysis of consumer benefits.

As this brief description of our work on energy efficiency performance standards suggests, our expertise is primarily in analysis of consumer economics and attitudes toward efficiency and their implications for the adoption of energy consuming durables. Therefore, we look forward to analyzing the data that is submitted to the commission in the proceedings that affect the important consumer durables covered by the order.

CFA appreciates California's leadership on energy efficiency standards once again. We look forward to participating in the CEC's process in developing appliance efficiency standards and to reviewing and analyzing the data to provide a strong consumer benefits case.

Thank you for your attention.

Sincerely,



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