

*Consumer Federation of America
Consumers Union
National Consumer Law Center
Consumer Action
Arizona Consumers Council Foundation
Chicago Consumers Coalition
Consumer Federation of California
Consumer Federation of the Southeast
Florida Consumer Action Network
Massachusetts Consumers' Coalition
Massachusetts Consumers Council
Virginia Citizens Consumer Council*

June 21, 2012

Brenda Edwards
U.S. Department of Energy
Building Technologies Program
1000 Independence Avenue, SW
Mailstop EE-2J
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 Ms. Edwards:

On behalf of the Consumer Federation of America and the consumer groups noted above, we urge DOE to review the assumptions and analyses used to develop the proposed standards for the most common types of battery chargers. We specifically ask that DOE identify the lowest-cost ways to produce efficient battery chargers for the key product classes and revise and correct the economic analyses accordingly. We expect that an analysis based on a realistic assessment of the lowest-cost path to improve efficiency will demonstrate that higher standard levels than those proposed will be cost-effective for consumers. We also expect that the more-efficient products will be similar in quality if not better than less efficient alternatives.

The key product classes represent 75 percent of battery charger products sold in the U.S. (e.g., phones, cameras, notebook computers, and power tools). California has already adopted cost-effective efficiency standards for these battery chargers, which are more stringent than the levels proposed by DOE. Aligning DOE standards for these products with California's standards would produce additional annual energy bill savings for consumers of nearly \$400 million in 2020 alone and would double DOE's estimated cumulative national energy savings to nearly two quads, or the amount of energy consumed annually by all the households in Florida and Georgia combined.

Battery chargers are ubiquitous in the U.S. today with approximately 1.6 billion nationwide, or an average of 14 per household. Many common products such as mobile phones, digital cameras, power tools, and even some children's toys include a battery charger. The number of chargers has risen to an all-time high and will continue to climb as more than 450 million new battery chargers are sold in the U.S. every year. Setting the standards at an appropriate level now will lock in consumer savings and save consumers hundreds of millions of dollars each year on their energy bills. For consumers, strong efficiency standards for battery

chargers are especially important since, for most products, consumers do not have a choice of battery chargers – they get whatever comes packaged with their new phone, camera, tool or other device.

DOE has missed the legal standard-setting deadline for these products by nearly a year. We suggest that DOE can address the shortcomings in its current analysis and still publish an appropriately strong new standard by the end of this year. In addition, it is important for DOE to correct its analyses now since it will be several years before DOE reviews this product again. By that time, several billion additional battery chargers will have been sold.

In closing, we urge DOE to review its assumptions and reassess the cost-effectiveness analyses used to develop the battery charger standard levels for key product classes. We believe that doing so will lead to additional energy and cost savings and environmental benefits for consumers.

Sincerely,

A handwritten signature in black ink that reads "Mel Hall-Crawford". The signature is written in a cursive, flowing style.

Mel Hall-Crawford, Energy Projects Director
Consumer Federation of America

Shannon Baker-Branstetter, Policy Counsel, Energy and Environment
Consumers Union, Policy and Action from Consumer Reports

Charles Harak, Senior Attorney for Energy Issues
National Consumer Law Center, on behalf of its low-income clients

Ken McEldwoney, Executive Director
Consumer Action

Phyllis Rowe, President
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Bill Newton, Executive Director
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Jeanne Foy, Secretary
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Paul Schlaver, President
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Irene Leech, President
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