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Sent: Tuesday, April 17, 2012 4:04 PM
To: Mulveny, Jennifer; Exparte Communications
Cc: Watt, Steve; Kido, Michael
Subject: RE: HP Ex Parte Memo on Proposed Rulemaking for Battery Chargers and External Power Supplies



This following notes summarize the discussion that HP held via teleconference with the Department of Energy on April 10, 2012.

Hewlett-Packard Company (HP) appreciates the opportunity to comment on the new DOE rulemaking for Battery Chargers and External Power Supplies. Thank you for taking the time to speak with us. HP believes that existing voluntary Market Access Requirements, such as EPEAT and ENERGY STAR, are the most effective mechanism for improving energy efficiency of IT products, but we understand the approach of regulating mandatory minimum efficiencies to address poor performing products. HP is a large manufacturer of PCs, Displays, Printers, Multi-function devices and Networking equipment. We have completed an initial assessment of the proposed rulemaking and its potential impact.

For Battery Chargers, HP recommends the following:

- Much stronger harmonization with the California Battery Charger regulation. The proposed DOE rules use different efficiency limits and limit formulas so it's possible that a battery charger could comply to one of the Regulations and not the other. Also, separate marking will be required as long as both regulations coexist.
- DOE should reconsider the efficiency limits for Class 3 Battery Chargers or the boundary condition of 10V which separate Class 3 and 4. Class 3 limits do not seem to align with the Class 2 and 4 limits, and will be extremely difficult to meet, especially for products in the 7-10V range. One suggestion is to revise the formula, and another suggestion is to redefine Class 3 as 4-7Vs, moving 7-10V battery chargers into Class 4 which has more feasible limits.
- DOE should consider the efficiency limits for Class 1 Inductive Chargers. We believe this limit is unfeasible for higher Battery Energy products, and could stifle innovation in certain product categories. One suggestion is to revise the Class 1 efficiency limit formula so it scales by Battery Energy. Another suggestion is to eliminate a separate category for Inductive chargers and have these chargers classified in other Categories (ie 2, 3 or 4) based on Battery Voltage.
- We recommend that the DOE reconsiders the efficiency limits for Class 8 Low voltage DC input Chargers. We believe this limit is unfeasible for USB charging of higher Battery Energy products, and could stifle innovation in certain product categories. One suggestion is to revise the Class 8 efficiency limit formula so it scales by Battery Energy.

For External Power Supplies (EPSs), HP recommends the following:

- New efficiency limits for Class A EPSs were unexpected. We are still working to understand and assess the potential impact with our EPS suppliers and product teams.
- The combination of new efficiency limits, a July 1, 2013 compliance date and compliance based on the use of date of importation for products manufactured outside the US, make these rules very challenging for our product categories.
- A phased approach, with efficiency limits correlating with the International Roman Numeral V for the July 1, 2013 compliance date, combined with an effort to develop a new efficiency standard (with input from Industry and EPS manufacturers) which would start as a voluntary Market Access requirement, perhaps incorporated in an upcoming ENERGY STAR specification revision.
- The current rules appear to favor domestic manufacturers. HP recommends the use of Worldwide Date of Manufacturing with five year exemption for Spare parts for EPSs manufactured before the Compliance date. This would alleviate significant inventory issues associated with the current proposed rules for products manufactured outside the US.