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December 23, 2010

Mr. Victor Petrolati
U.S. Department of Energy
1000 Independence Ave.
Washington, DC

Subject: Ex Parte Meeting with DOE and Navigant Consulting on Battery Charger Energy Standards, December 6, 2010

Dear Mr. Petrolati:

This memo memorializes the meeting between AHAM, PTI and the Department of Energy on December 6, 2010 for inclusion in the public docket.

In summary, during the meeting, we were able to cover several topics that are related to DOE setting the standards for consumer battery chargers that apply to power tools and other appliances and fall under the category of Motor Operated and or Detachable Battery (MADB) chargers.

1. AHAM and PTI noted that some of the Candidate Standards Levels for Product Classes 2, 3, and 4 appear to be set dependent upon the type of cell chemistry. It looked in the initial evaluation that CSL 2 was only achievable with Lithium-based cell chemistries.
2. AHAM and PTI noted that most of the consumer products marketed are still composed of nickel-based battery chemistries which continue to offer great consumer value. Often, consumers do perceive the value that lithium-based batteries might bring them. This restricts the value for consumers and makes it difficult to market them.
3. Most of the products in Product Class 3 are computer devices and they mask the cost and performance of the consumer MADB battery chargers. AHAM and PTI asked DOE and Navigant to investigate what would happen to the LCCA of Product Classes 2, 3, and 4 if the computer products (non-MADB) were backed out of the equations.
4. AHAM and PTI noted that the preponderance of the BCS's are under 50 Wh and asked that DOE and Navigant consider a minimum value on the line slopes that could be drawn horizontal to allow for fixed energy losses of lower power systems.
5. AHAM and PTI asked DOE to look again at the usage profiles, particularly for the Class 2 infrequently charged products. In addition, there seems to be a wide split of products in Class 2,

with many digital devices already at CSL 1 or 2, but most nickel-chemistry consumer MADB devices at CSL 0. This would mean that any increase should consider the impact on the MADB and not factor in the products that are already well beyond CSL 1 or 2.

6. AHAM and PTI pointed out that there are additional costs that may not have been considered in the original LCC.

a. UL 2575 is being implemented in 2010 and 2011 and will have an effect requiring additional safety redundancies for lithium power cells that are used in MADB applications but not in computer devices.

b. In order to meet consumer expectations on cell life, manufacturers using Lithium chemistries may install discharge control devices. It seems as if the samples that Navigant and DNR considered for the costing analysis may not have included this functionality that would provide constant utility compared to nickel based systems. AHAM and PTI asked DOE to look at the LCC again.

The attendees at this meeting were, Mr. Larry Albert representing Power Tools Institute (PTI) and Wayne Morris, representing the Association of Home Appliance Manufacturers (AHAM) were present in addition to Michael Vladimir, Matt Nardotti and Michael Rivest of Navigant, Victor Petrolati from DOE and Toby Swope of DNR.

We appreciate the opportunity to meet with DOE on this subject. We are enclosing a set of PowerPoint slides that were used in the discussion.

Sincerely,

A handwritten signature in black ink that reads "Wayne Morris". The signature is written in a cursive, flowing style.

Wayne Morris
Vice President, Division Services