

Power Tool Institute
Comments on DOE NOPR
for EPS and Battery Chargers

Docket EE-2008- BT-STD-0005

May 2, 2012

PTI

- The Power Tool Institute (PTI) is a trade association of power tool manufacturers that do business in North America
- PTI has been a frequent and responsible contributor to EPS and Battery Charger rulemaking federally and in other jurisdictions
- In addition, PTI members have demonstrated their support of energy conservation through their Energy Star partnerships

PTI Position

- PTI has long supported the goal of battery charger energy efficiency requirements as a means to contribute to national conservation goals, providing....
 - That these requirements are at least national in scope
 - That EPS standards apply only to true power supplies and not elements of battery chargers
 - That standard is based upon a meaningful measurement of usage
 - That the standard provides positive financial consumer benefit
 - That standards are achievable using proven technology

EPS

- PTI supports the creation of class N EPS's
 - Significant impact on integral battery
 - Test is meaningful and feasible
 - Clarification of language as applies to detachable pack products may be helpful
 - PTI believes the department honored the intent of the EISA MADB exclusions

Battery Chargers

- PTI believes the methods and the limits are appropriate for the classes of products covered.
- PTI believes the methods and limits fulfill our stated position
- PTI agrees that vehicular powered battery chargers should be exempted
 - Are not powered outside of vehicle
 - DOE correct in setting no standard

Appropriateness of Standards Levels

- BC Standards levels are appropriate and can be achieved by July 1, 2013 date
- DOE should not consider CEC levels as the new baseline
 - Unachievable by CEC date
 - Negative consumer benefit
 - Leaves no room for Energy Star

Energy Star

- Power Tool manufacturers have been avid participants in the Energy Star BCS program
 - Large proportion of Energy Star listings are power tool and allied products
 - Steady transformation through our industry
 - Driven industry innovation
- Any mandatory standard creates recalibration of specification levels
- But overly restrictive standard (such as CEC) creates “reset” that could eliminate all Energy Star offerings
 - Could effectively eliminate program in future

Thank you