



**EDISON ELECTRIC
INSTITUTE**

May 14, 2010

Mr. Hampton Newsome
U.S. Federal Trade Commission
Office of the Secretary
Room H-135 (Annex T)
600 Pennsylvania Avenue, NW
Washington, DC 20580

RE: Notice of Proposed Rulemaking for Appliance Labeling of Television
Sets Required under the Energy Policy and Conservation Act
Docket No. EERE-2007-BT-STD-0007

Dear Mr. Newsome:

The Edison Electric Institute (EEI) appreciates the opportunity to submit comments regarding the FTC's proposed rule on the disclosure of energy usage information of television sets.

EEI is the association of the U.S. shareholder-owned electric companies, international affiliates and industry associates worldwide. Our U.S. members serve over 97 percent of all customers served by the shareholder-owned segment of the industry. They service 71% of all ultimate customers in the United States. Many of our members are combination electric/gas companies, and provide efficiency services for both fuel types.

EEI is in favor of the labeling, as it follows the format of other appliance EnergyGuide labels. It is also technically accurate as it only uses site energy metrics for the basis of the analysis.

In terms of improvements, EEI would suggest that the average annual energy usage and annual costs of smaller TV sets (under 27 inches in diagonal length) be based on a typical daily usage of 2-3 hours per day, rather than 5 hours per day. In many cases, there is one "primary" television that is likely to be used for 5 hours per day or more, but there are also "secondary" televisions, which tend to be smaller and located in bedrooms, that are used much less often. Because of this usage diversity, showing the usage of 5 hours per day for all

TV's will over state the energy usage and costs of many televisions, as well as overstate the savings from using a more efficient television.

EEI believes that the FTC has done a thorough and admirable job with the NOPR document and workshop. EEI hopes that FTC will consider our suggestions for the upcoming Final Rule.

EEI sincerely appreciates the opportunity to submit these comments.

Respectfully submitted,

Steven Rosenstock, P.E.
Manager, Energy Solutions
Edison Electric Institute

cc: Rick Tempchin, EEI
Ed Comer, EEI