



May 14, 2010

Mr. Hampton Newsome  
Federal Trade Commission  
Bureau of Consumer Protection  
Room M-8102B  
600 Pennsylvania Avenue, N.W.  
Washington, DC 20580

**RE: Rule Concerning Disclosures Regarding Energy Consumption and Water Use of Certain Home Appliances and Other Products Required Under the Energy Policy and Conservation Act “Appliance Labeling Rule”.  
[RIN 3084-AB15]**

Dear Mr. Newsome:

This letter contains the comments of the Pacific Gas and Electric Company (PG&E), Sacramento Municipal Utility District (SMUD) and Northwest Energy Efficiency Alliance (NEEA) in response to the request for comments made by the Federal Trade Commission (FTC) on extending the Appliance Labeling Rule to Consumer Electronics and the discussion during the related FTC public meeting held on April 16, 2010. As energy companies, we understand the potential of energy labeling requirements to improve access to energy consumption information and help consumers make informed decisions on the energy consumption of their consumer electronics. The FTC has a history of successful appliance energy labeling programs including refrigerators, clothes washers, water heaters, ceiling fans, and air conditions.

We strongly support the labeling of consumer electronics equipment, and as the FTC moves forward with its consumer electronics label proceeding, we encourage FTC to consider the following recommendations.

COMMENTS ON FTC PROPOSED TEST PROCEDURE:

- 1. We support a test method that allows for testing of additional functionalities that may become prominent in the future.***

We support a test method that allows for testing of additional functionalities that may become prominent in the future. Television capabilities are changing rapidly over time, and as representatives from the Natural Resources Defense Council (NRDC) and the Energy Star Program mentioned in the April 16 hearing, it is critical that the FTC test procedure be able to incorporate and test new features such as 3-D and internet connectivity.

COMMENTS ON LOCATION AND SIZE OF LABEL:

**2. The FTC should ensure that the energy label is easily visible to the consumer.**

The FTC should ensure that the energy label is easily visible to the consumer. To be clearly visible, the energy label should be affixed to the front side of the TV, and must be large enough for consumers to see it. In our experience in a joint consumer electronics program, our program labels were 15 square inches. Retailers had the option of placing the program label in either the horizontal or vertical directions to accommodate their needs and preferences. While we do not recommend a specific shape or format, we recommend the label be at least 15 square inches.

COMMENTS ON BIN SIZE

**3. In establishing an appropriate bin size, we recommend a bin size of less than 10 inches.**

The FTC previously recommended a bin size of 10". However, we believe that this bin size is too large and allows different sizes to be unfairly compared to one another. In developing these bin size categories, it is important to create uniform size bins while simultaneously ensuring that differently sized models are not unfairly compared to one another. Presently, the vast majority of televisions currently come in the following sizes: 19, 22, 26, 32, 37, 40, 42, 46, 55 and 65 inch screens, as supported by Figure 1 and also mentioned by the Consumer Electronics Association (CEA) during the FTC's recent public hearing. This data is based on models meeting the March 16 Energy Star 3.0 TV specification.

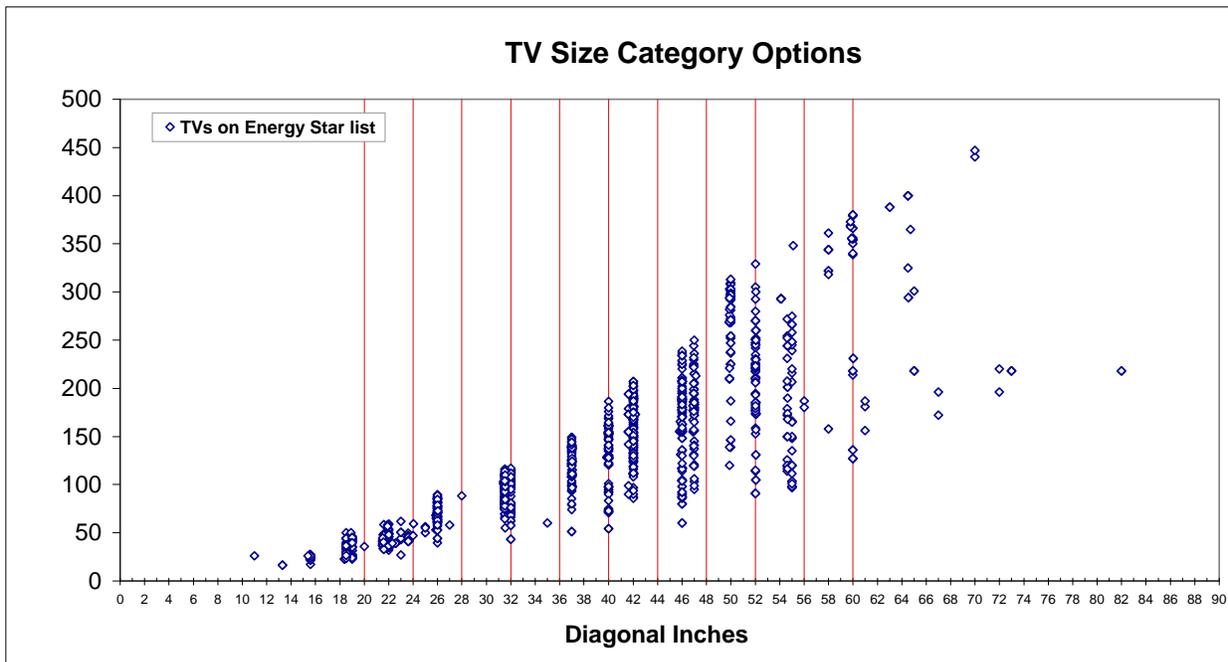


Figure 1: Television Screen Size vs. On Mode Power

Screen Size Bin	Popular Sizes
0 to 20.0"	19"
20.1 to 24.0"	22"
24.1 to 28.0"	26"
28.1 to 32.0"	32"
32.1 to 36.0"	
36.1 to 40.0"	37, 40"
40.1 to 44.0"	42"
44.1 to 48.0"	46, 47"
48.1 to 52.0"	50, 52"
52.1 to 56.0"	55"
56.1 to 60.0"	60"
60.1" or more	65"

**Figure 2: Proposed Bin Size**

Based on the clustering of TV models in Figure 1, we believe that a 4" bin size, seen in Figure 2 below, provides sufficient resolution to fairly compare televisions while maintaining standard size categories.

As Figure 2 suggests, only three size bins have multiple popular screen sizes in them, which limits cross-comparisons between differently sized sets. We believe that as product size and preferences shift over time, uniform size bins will continue to ensure a fair comparison between models.

COMMENTS ON ONLINE PLACEMENT OF ENERGY LABELING INFORMATION

- We recommend energy labeling be required on retailer and manufacturer websites. In addition, we recommend the FTC create an online database that includes energy consumption data for all televisions.***

We recommend energy labeling be required on retailer and manufacturers websites. In addition, we recommend the FTC create an online database that includes energy consumption data for all televisions. As discussed at the April 16 public hearing, many shoppers conduct their research online before going to the store to purchase a TV. To ensure these consumers have access to energy consumption information, we recommend that retailers and manufacturers be required to display a virtual energy label on their website, listed as part of the product specifications. In addition to posting this information online, we recommend that the FTC create a database that includes energy consumption information for all televisions. The FTC already maintains a database for air conditioners, clothes washers, dishwashers, water heaters, refrigerators and freezers, furnaces and boilers, and ceiling fans. Utilities and other interested parties will find this information extremely valuable in developing relevant consumer electronics incentive programs.

COMMENTS ON LABELING REQUIREMENTS FOR ADDITIONAL CONSUMER ELECTRONICS

- We recommend that the FTC proceed with hearings for labeling requirements for additional consumer electronics such as Computers and Monitors.***

We recommend that the FTC proceed with hearings on labeling requirements for additional consumer electronics such as Computers, and Monitors. Providing access to this energy consumption information is critically important in helping consumers make informed decisions. For each of these products, Energy Star currently has a test specification that we believe is sufficient to use as is or with slight modification. In addition, we believe that the FTC should annually review individual consumer electronics products, particularly Set Top Boxes and Game Consoles, to determine if a labeling requirement is appropriate.

Thank you for the opportunity to provide comments.

Sincerely,

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