

March 22, 2019

Senka Krsikapa  
Ministry of Energy, Northern Development and Mines  
Conservation and Renewable Energy Division  
77 Grenville St.  
5th Floor  
Toronto ON M7A 2C1  
Canada

**Subject: Proposal to amend Ontario's Energy and Water Efficiency Regulation under the Electricity Act, 1998 (ERO 013-4675) – COMMENTS in SUPPORT**

Dear Senka:

The Consumer Technology Association (CTA) supports the proposed amendments that would amend the current Energy and Water Efficiency Regulation under the Electricity Act, 1998 to exclude ultra-high definition (UHD) 8K televisions from television on-mode requirements. CTA appreciates that Ontario is responsive to industry's concerns that the outmoded regulations inhibit the sale of the latest television and display technology to Ontario consumers, and undermine consumer choice in the province. CTA also supports the proposed amendments that aligns the regulations for external power supplies and battery chargers with Natural Resources Canada's (NRCan's) energy efficiency labeling requirements.

The Consumer Technology Association™ (CTA™) is the trade association representing the North American consumer technology industry. Our membership includes more than 2,200 companies, 80 percent of which are small businesses and startups, with others among the world's best-known manufacturer and retail brands. CTA's membership spans the breadth of the consumer tech industry and includes component suppliers, device manufacturers, software companies, retailers, distributors, installers and service providers. All of these players contribute to industry-wide efforts to improve energy efficiency and in turn help consumers save money on their electricity bills. Many of our members are partners in the ENERGY STAR program, and several have received awards for their achievements in the program. CTA also owns and produces CES® – the world's gathering place for all who thrive on the business of consumer technologies.

CTA supports the proposed amendments and requests that the Ministry of Energy, Northern Development and Mines (Ministry) act on these proposed changes as quickly as possible.

Specifically, CTA continues to remain concerned on the imminent impact on the sale of UHD 8K televisions that will result from the current regulations remaining in effect. As a reminder from our previous communications to the Ministry, the initial models of 8K televisions that are beginning to debut in the United States and Asia have on power measurements that will exceed the current regulatory limits. Ontario's regulation does not provide a size limitation as in the California Energy Commission's (CEC's) energy efficiency regulation, which requires only television screens up to 1400 square inches to comply with on-mode energy requirements. Swift action is needed to avoid the prevention of the sale of UHD 8K televisions in Ontario.

With all of this in mind, CTA would like to stress that the adoption of already existing requirements can create unintended consequences, and CTA is not supportive of this approach for energy efficiency advancements. CTA notes that, given the requirements that exist at the Federal level in Canada or in various U.S. jurisdictions, Province-specific requirements such as those in Ontario are unnecessary. Consumer technology products are sold in a North American market, meaning products sold in Ontario are already compliant with any NRCan or U.S. jurisdiction requirements. Ontario-specific regulations provide no additional energy savings to consumers. The adoption of other jurisdictions' requirements is not the path forward to achieve energy efficiency savings for consumers.

Televisions are an energy efficiency success story. Today's televisions are consuming less energy and saving consumers more money – even as TVs increase in size and resolution capabilities. To avoid depriving Ontario consumers the ability to purchase 8K TVs from their local retailers, we are eager to see the proposed amendments adopted as quickly as possible. CTA strongly supports the proposal to amend Ontario's Energy and Water Efficiency Regulation under the Electricity Act, 1998 (ERO 013-4675). We thank you for your work on this important issue.

Sincerely,



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Vice President, Technology Policy  
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