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Filer:	Alex Baker
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1812 N. Moore Street, Suite 2200
Arlington, VA 22209
703.841.3200

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Ho Hwang
California Energy Commission
Docket Unit, MS-4
Docket No. 17-AAER-12
715 P Street
Sacramento, California 95814

Submitted Electronically To: docket@energy.ca.gov, re: docket number 17-AAER-12

Re: Voluntary Performance Framework for Low-Power Modes Version 1.0

Dear Mr. Hwang:

The National Electrical Manufacturers Association (NEMA) represents over 300 electrical equipment manufacturers that make safe, reliable, and efficient products and technologies that power, connect, and light our world. Together, our members contribute a full 1% of U.S. GDP and directly provide over 590,000 American jobs, adding more than $375 billion to the U.S. economy. Learn more at makeitelectric.org

NEMA's Lighting Systems Division members have taken great interest in the California Energy Commission's low-power mode proceeding since its inception in 2017 and appreciate the Commission's continued engagement with Electroindustry. NEMA members support this collaborative effort to identify meaningful and non-disruptive opportunities to save energy. We are pleased to provide further input with the following comments on the Voluntary Performance Framework for Low-Power Modes Version 1.0 ("Framework").

Lighting Controls in the Framework

We understand that lighting controls remain *in-scope* of the VPF-LPM process in part because comparing "*smartphone network standby consumption with that of networked, mains-powered products shows a considerable gap between many of today's connected devices and the battery-powered counterparts*" (Framework, Introduction). While the comparison is thought provoking, there are important if not obvious differences between connected devices – such as lighting control system components – and smart phones, that result from the very different design goals underpinning such products.

A smartphone contains a miniaturized network of low-voltage sensors, radio transmitters and receivers, touchscreen display(s), logic controllers and other components in a small lightweight

device, where power consumption (measured in fractions of a watt) is necessarily reduced to the lowest conceivable limits enabling functionality and energy efficiency inside a form factor that safely operates in the palm of a consumer's hand. Conversely, a lighting control system is typically composed of many fixed component assets operating across the extent of a given built environment, which, like the loads they control (measured in tens or hundreds of watts), leverage the availability and reliability of mains voltage power sources.

It is the diminutive size of smartphone devices and the adjacency of their various components that both enables and necessitates low power consumption and low standby power consumption. In contrast, widely disbursed networked lighting control system components require very different standby circuitry for the critical tasks of illuminating spaces for safe occupancy during normal use and for illuminating emergency egress and the navigation of first responders – who typically do not have first-hand knowledge of the building they are navigating – during emergencies.

The optimized *network standby consumption* of a smartphone is not directly relevant to the design of lighting control systems. It is for these reasons and more that NEMA members agree, for purposes of this proceeding, that lighting controls should not be *in-focus* at this time.

Short Term Recommendations

First, as the CEC moves forward with implementing Framework V1.0, with regard to lighting control systems, we ask Commission staff to consider if the longstanding industry standard NEMA SSL 7A-2015 (R2021) *Phase-Cut Dimming for Solid State Lighting: Basic Compatibility* adequately delineates lighting control system components meeting the goals of the Commission's proceeding.

The Framework notes that "*the term 'low-power modes' is used as devices can have multiple low-power, sleep, standby or inactive states, and the power consumption of all such modes is of interest to staff*" (p.5). Given the critical need for lighting control systems to enable illumination when and where it is needed, particularly during emergencies involving the egress of building occupants and the navigation of first responders, we ask the Commission to clarify to Framework users that the 'always-on' condition of products, including many lighting control system components, should not be considered the *DCP inactive condition* as defined in the Framework glossary.

Finally, procedurally speaking, NEMA members ask the Commission to extend the Framework's data reporting periods to no less than one year. The timeline for reviewing and understanding the Framework, identifying and security appropriate laboratory resources, completing testing and reporting of such data, requires such flexibility, especially when considered in the context of the Commission's "*numerical minimum targets [to] accurately reflect about 50 percent of the market*" (Framework, p.16). Adequately equipped and accredited first- and third-party laboratories are a limited resource, and these limitations must be factored into any large data gathering effort such as the one envisioned here. NEMA members believe that data reporting periods of no less than one year will maximize meaningful participation in this voluntary program.

NEMA's lighting members look forward to continuing this discussion and providing considerably more information about the above topics at a meeting with Commission staff later this year. In the meantime, please reach out to alex.baker@nema.org if we can provide further support.

Sincerely,

Alex Baker
Director, Regulatory & Industry Affairs