

California Energy Commission

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**PHILIPS**

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December 5, 2013

Submitted via email: [docket@energy.ca.gov](mailto:docket@energy.ca.gov)

Ms. Karen Douglas Commissioner California Energy Commission 1516 Ninth Street Sacramento, California 95814	Mr. Andrew McAllister Commissioner California Energy Commission 1516 Ninth Street Sacramento, California 95814
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**Letter in Support of Revised Effective Date for the 2013 California Building Energy Efficiency Standards**

Dear Commissioners Douglas and McAllister,

Philips appreciates the opportunity to comment in favor of the proposed extension of the effective date of the Title 24 Building Energy Efficiency Standards.

As you may know, Philips is a strong, diversified industrial group leading in health and well-being with \$32.1 billion sales globally and 114,000 employees. California is the global headquarters for our Philips Lumileds LED business. Within the state, we employ 1600 people in 13 locations with \$254.3 million in annual payrolls.

We support the extension because it will afford the additional time needed to establish, revise and roll out the necessary clarifications to requirements and compliance manuals, establish the additional educational materials for designers and builders, and complete the modification to other tools such as certification and reporting databases – all of which are critical to establishing a firm footing as the new code is implemented. Modifying the effective date to allow for the completion of these steps will help avoid a negative backlash to high efficiency technologies and allow for easier implementation of and adherence to regulations.

Thank you for your consideration of these concerns. In your reply to these matters and for any questions regarding these issues, please contact myself at (202) 962-8559 or [keith.cook@philips.com](mailto:keith.cook@philips.com)

Sincerely,



Keith R. Cook  
VP – Technology Policy & Standards