

DOCKETED

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April 15, 2015

Submitted via email: docket@energy.ca.gov

Mr. Andrew McAllister
Commissioner
California Energy Commission
1516 Ninth Street
Sacramento, California 95814

Philips Lighting Comments on the Proposed Revisions to the California Building Energy Efficiency Regulations, Title 20, 45-Day Language

Dear Commissioner McAllister,

Philips Lighting appreciates the opportunity to provide the attached comments on the proposed revisions to the California Building Energy Efficiency Regulations.

As you may know, Philips North America is headquartered in Andover, Massachusetts. The U.S. Philips companies are affiliates of the Netherlands-based Royal Philips N.V., a diversified health and well-being company, focused on improving people's lives through meaningful innovations. Our long history in North America began in 1933, and today, it is the company's largest single market in the world, with approximately 22,000 employees and operations at 55 major facilities in 25 states and across 3 Canadian provinces. Sales for the region in 2013 was more than \$9.5 billion*, which accounts for more than 30% of Philips global revenue.

Philips is a diversified technology company, focused on improving people's lives through meaningful innovation in the areas of Healthcare, Consumer Lifestyle and Lighting. Innovation has been a cornerstone of the company's strategy for over 120 years, creating a strong and trusted Philips brand with market access all over the world. Philips is a leader in cardiac care, acute care and home healthcare, energy efficient lighting solutions and new lighting applications, as well as male shaving/grooming and oral healthcare. Philips lights 65% of the world's top airports, 30% of offices and hospitals and landmarks such as the Empire State Building, the Sydney Opera House, the New Year's Eve Times Square Ball and the Great Pyramids. Philips owns more than 64,000 patent rights, is one of the world's top-50 most valuable brands, one of the world's top-50 most innovative companies, and ranked as one of the Best Global Green Brands by Interbrand.



California Title 20

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Please find our detailed comments below. We look forward to working with you further on this important effort. If you have any questions on these comments, please contact me.

Sincerely,

A handwritten signature in black ink that reads "Keith R. Cook".

Keith R. Cook
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Comments for 45-Day Proposed Language for Title 20

Philips supports the continuing efforts of the CEC to reduce energy consumption through the Appliance Efficiency Regulations. However, we have become increasingly concerned that many comments for proposed changes in these requirements presented previously to the CEC have not elicited any action nor generated any response to address our concerns. Therefore, we are restating these comments for consideration again, along with comments for the proposed 45-day language, in the hope that CEC staff will continue to work with us to define requirements that take into account current and developing technologies.

Scope

Philips maintains that the scope of the current proposal for Deep-dimming Ballasts is too broad, given the limited number and type of products that were submitted for testing by the California Investor Owned Utility (IOU) working group. We continue to maintain that the sample size for these products is not statistically significant to accurately represent the full range of products available in the marketplace.

***Proposal:* Limit the scope of this rulemaking for dimming ballast regulation to only those ballasts designed for use with 4' linear 32W T8 one and two lamp systems employing continuous dimming technology, and strike references to T5 and stepped dimming models.**

Standby Power

Philips is concerned that the CEC's proposed limitation of 1W for standby power is too low for certain types of dimming technology used for lighting controls. It should be noted that the CASE study only conducted testing for communications-enabled ballasts; minimum dimming levels vary with other dimming protocols, and no allowances are made for different technologies. In addition, a low standby power specification will negatively impact connectivity, functionality and flexibility needed for the continued proliferation of intelligent lighting controls, and necessary for other initiatives such as demand response.

***Proposal:* Raise the maximum allowance for standby power from 1.0W to 1.5W. We also suggest to align the standby power test procedure with the DOE procedure defined in 10 CFR 430 Appendix Q, which does not include a measurement for P₀. If no additional allowance is made, we urge the CEC to limit the scope of standby measurements to communications-enabled ballasts, until such time similar data is made available for other dimming technologies.**

Cathode Cutout and Lamp/Ballast Compatibility

Philips is concerned that continuing to reduce the proposed allowances for dimming ballast performance, will negatively impact lamp/ballast compatibility. It has been shown that different

fluorescent lamp technologies have different requirements for filament heating, which is critical to ensure lamp life.

Proposal: Philips recommends the CEC follow the recommendations of NEMA Standard LL-9 to ensure the greatest flexibility in lamp/ballast compatibility.

Dimming Ballast Efficiency Requirements

While Philips appreciates the CEC decision to maintain the lowest arc power efficacy test point at 50% arc power, we believe that testing at three test points to determine ballast efficiency is unnecessary and overly burdensome to manufacturers. In addition, the weighted ballast luminous efficacy metric is overly complex and adds unnecessarily to the reporting burden. We question the validity of the data used to develop the relative usage values table used for the calculation described in 1604(j)(D).

Proposal: Philips supports the proposal presented to the Commission by NEMA which proposes to test 1 and 2 lamp 32W T8 fluorescent dimming ballasts at 100% and 50% arc power, that utilizes these two test points to set minimum Ballast Luminous Efficiency (BLE) requirements, for which products to be sold in California must equal or exceed for each dimming level. This methodology is based on an adapted version of the U.S. DOE's minimum BLE requirement, similar to that for fixed output ballasts. Philips also proposes that the CEC align its reporting format with the DOE requirements, in which BLE is reported to three decimal places, and which would allow manufacturers to use existing data collection and reporting systems. We propose changing item J in Table X to correspond with this proposal.