

DOCKETED

Docket Number:	15-AAER-06
Project Title:	Small Diameter Directional LED Lamps and General Purpose LED Lamps
TN #:	207752
Document Title:	Philips Lighting Comments: Philips Lighting Comments on Revised 15 Day Language 1-20-16
Description:	N/A
Filer:	System
Organization:	Philips Lighting
Submitter Role:	Public
Submission Date:	1/20/2016 8:29:40 AM
Docketed Date:	1/20/2016

Comment Received From: Philips Lighting

Submitted On: 1/20/2016

Docket Number: 15-AAER-06

Philips Lighting Comments on Revised 15 Day Language 1-20-16

Additional submitted attachment is included below.



January 20, 2016

Submitted via e-filing

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

Docket No.: 15-AAER-06

**Comments on Title 20 – Revised 15 Day Language - Small Diameter Directional Lamps,
General Purpose LED Lamps, and Portable Luminaires**

Dear Commissioner McAllister,

Philips Lighting appreciates the opportunity to provide the attached comments on the revised 15-Day Language issued January 7, 2016 for Small Diameter Directional Lamps, General Purpose LED Lamps, and Portable Luminaires.

The comments on the following page are what we consider to be technical corrections to the 15 Day language. We will submit more extensive comments by the 22nd.

Sincerely,

A handwritten signature in black ink, appearing to read "David Woodward".

Dr. David Woodward
Standards and Regulations Manager Americas
Philips Lighting

Tel: (662) 620-6754
e-mail: david.r.woodward@philips.com





Comments on Title 20 – Revised 15 Day Language (1/7/16)

Small Diameter Directional Lamps, General Purpose LED Lamps,
and Portable Luminaires

January 20, 2016

Philips Lighting appreciates the opportunity afforded by the Energy Commission to submit written comments on the revised 15 day language for small diameter directional lamps, general purpose LED lamps, and portable luminaires.

We offer the following technical corrections specific to small diameter directional lamps.

Technical Corrections

Section 1602

Under the definition of “state regulated small diameter directional lamp” the following changes should be made, noted in **bold**:

1. **Has a rated voltage of** 12 volts, 24 volts, or 120 volts;
2. Has an **E26 base** or a pin base listed in ANSI ANSLG C81.61-2009 (R2014) **compliant pin base or E26 base**;
3. Is a non-tubular directional lamp with a diameter of less than or equal to 2.25 inches;
4. Has a **rated** lumen output of less than or equal to 850 lumens, or has a **rated** wattage of 75 watts or less; and
5. Has a rated life greater than 300 hours.

The proposed change to item 1 clarifies that it is the rated voltage which is used to determine whether a lamp is in scope or not, rather than whether it operates at a given voltage. The word ‘capable’ is too vague and not appropriate. A 12V lamp, for example, is capable of operating at 24V, but its performance may not be the same as that at 12V.

Item 2 has been changed to remove the word ‘compliant’, as to avoid the case of whether or not the base actually complies with the construction in the ANSI standard and has to be tested for such. The change above simply means that if the pin base is claimed to be one of the listed ANSI bases, the product is in scope.

Item 4 clarifies that it is the rated, not measured, values for lumen output and wattage that determine if a lamp is in scope or not. It is also consistent with the phrasing of item 5.

END COMMENTS