Testimony for 2016 California Title 24 Workshop on 6/24/14

To: California Energy Commission
Staff Workshop June 24, 2014 - 2016 Building Energy Efficiency Requirements (Title 24)
Docket: 14-BSTD-01

From: The American Lighting Association (ALA)*

Residential Lighting

The American Lighting Association submits the following as stakeholder input for the residential lighting portion of the 2016 Building Energy Efficiency Requirements.

The ALA is pleased to have the opportunity to provide this input for consideration by the CEC staff and commissioners as the 2016 Rulemaking process begins, and we anticipate being a part of the discussions as the process continues on behalf our retail and manufacturing members who do business in California.

We provide the following being aware of the impending implementation of the 2013 residential lighting standards on July 1, 2014, and the recent pre-workshop proposals presented at the May 15, 2014, meeting by the California IOUs.

1. We support the proposals to provide quality illumination. Consumer input via our ALA retailers and designers continues to indicate that there remains a desire for familiar "incandescent-like" illumination quality.

2. The 2013 standards just going into effect are, we believe, unduly prescriptive and limit options for both consumers and manufacturers. This slows and limits both the availability and the acceptance of energy-saving lighting products.

   Choice, in our view, is essential for acceptance.

3. Accordingly, for the 2017 standards, we support the idea of a broader definition of "High Efficacy" luminaires to include screw-based sockets packaged together with a light source that meets California's performance requirements.

   It should be noted that the residential lighting industry operates on a 2 to 2.5 year design cycle for LED light engine residential products from initial concept to tested and qualified

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stock available in quantity at retail. Existing screw-base luminaire designs that can be more rapidly adapted, tested and qualified for efficient screw-based lamp products can help to speed up the choice and availability of products as well as their acceptance by consumers as they are already familiar with the style and appearance of such products.

4. We understand how important lighting quality and particularly color rendering is to the CEC and we agree that good color, high light output, familiar appearance, dimmability and high performance are all essential for the acceptance by consumers of LED lighting. Recent trade shows and product introductions have included an increasing number of LED products that can provide these features from a technical standpoint, but not yet at price points that ensure a mass acceptance. We urge that the industry be consulted as this process proceeds so we can work together to ensure that acceptance, installations and energy savings result.

   We cannot emphasize enough how important a broad range of product choices at market price points are to the acceptance of energy-saving lighting products.

5. According to ALA retailers, there are increasing numbers of lighting products being installed in California that are being purchased outside of California directly or via the internet (estimates suggest that internet sales are approaching 20% of the total). Therefore, any requirements such as those which go into effect on July 1, 2014, or via these proposed 2016 standards must be supported by a "level playing field" for retailers and distributors. Our experience is that without uniform rules and enforcement, those who work to meet the requirements are at an increasing disadvantage leaving only those not meeting the requirements in business.

Respectfully,

Richard D. Upton, CCE
President/CEO

**The ALA is the trade association for the residential lighting industry in the United States, Canada and the Caribbean. Our membership of 1,475 companies include 134 California members consisting of: 18 designers, 4 associate members, 29 manufacturers, 25 manufacturers' representative companies and 58 retail companies with 103 store locations.*