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CEC's proposed 15-day language for LED general service lamps

Dear Commissioners,

I am writing to express my non-support of the CEC's proposed 15-day language for LED general service lamps and MR and Small Diameter Lamps.

The CEC's arguments display clear bias towards a very specific product design, despite no credible evidence to justify the proposed measures. The CEC has first failed to prove there is an problem with consumer acceptance to solve in the market. In fact, ENERGY STAR and other sources point to ever-increasing sales; changes of hundreds of percent positive improvement each year.

The CEC's decision to continue down the path of an argument based on consumer satisfaction ignores the skyrocketing sales figures for LED bulbs, and demonstrates the CEC's unwillingness to admit they no longer have a problem to solve with LED bulbs.

While there is no longer a problem with LED bulb adoption, there are still problems in California; high electricity prices and climate change. Governor Brown recognized these issues in his direction to the State to save as much electricity as possible. How is it then that the CEC is promoting LED bulbs that are LESS EFFICIENT than those commonly sold today? There is no justification for this and the CEC's insistence on a flawed argument is counter to the State's goals.

The CEC should not be deciding for citizens what light bulbs they can have in their homes by setting unfounded performance requirements for appearance and color. Instead, the CEC should allow consumers to make the choice for themselves, and respect that some consumers are more cash-conscious than others. The CEC also ignores the fact that the bulbs on the market today are MORE EFFICIENT than the bulbs the CEC is seeking to mandate. This is ridiculous, and ignores the CEC's primary mission to identify and encourage high-efficiency products.

By seeking to mandate more expensive, less efficient, less desirable (according to sales figures) light bulbs in the market, the CEC demonstrates that they are losing touch with their mission to help Californians save energy (not to mention pocket money).

DROP THE 15-DAY PROPSAL AND CANCEL THE RULEMAKING.