

## DOCKETED

<b>Docket Number:</b>	15-AAER-06
<b>Project Title:</b>	Small Diameter Directional LED Lamps and General Purpose LED Lamps
<b>TN #:</b>	208576
<b>Document Title:</b>	Edward Yandek Comments: Comments to Docket Number 15-AAER-06
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	Edward Yandek
<b>Submitter Role:</b>	Public
<b>Submission Date:</b>	1/22/2016 5:19:34 AM
<b>Docketed Date:</b>	1/22/2016

*Comment Received From: Edward Yandek*

*Submitted On: 1/22/2016*

*Docket Number: 15-AAER-06*

## **Comments to Docket Number 15-AAER-06**

I do not support the proposed 15 day language establishing CRI requirements for LED general service lamps and Small Diameter Directional Lamps.

Although I am not a resident of California. CEC requirements on mass produced products can result in a ripple effect into other states. Therefore, residents of other states have a right to be concerned in the even CEC requirements are not justified, add cost for little or not benefit, or restrict consumer choice.

Unfortunately, the current 15 day language proposal runs afoul of all of the above.

Projections on the potential energy savings that would result from the implementation of this proposal are not based on a sensible analysis. Allowing 80 CRI products to exist will not result in a drastic reduction of potential energy savings. For many years both 70+ and 80+ CRI fluorescent lamps co-existed to allow a sensible choice to commercial and residential consumers, and having this options ensured that suitable choices provided for the optimum energy and cost trade off to the end user. The same would be true for LED products. If consumers desire a higher CRI LED product, they will be available, and competition will result in the lowest practical cost for such products. On the other hand, there are many applications where an 80 CRI lamp would provide perfectly acceptable color rendering. Consumers should have the right to choose which product they wish to purchase for which application. If competition drives all LED products to a higher CRI, which may happen over time, then that should be determined by market forces and consumer demand. In the meantime, additional requirements that restrict user choice and do NOT result in ensured energy savings should be avoided.

In addition, the technical situation with CRI and LEDs is still fluid. It is premature for CEC to insert itself into the process of mandating a product choice based on CRI when the ultimate definition of CRI may in fact still not be finally determined nor completely accepted for LED products.

As a lighting expert with 40+ years of experience, I would prefer to let the market and competition sort this out since there is no evidence that such a draconian requirements is necessary to improve the adoption rate of LED products. The many benefits of LEDs are already driving this adoption, and, as costs continue to decline, the rate will accelerate further. This proposed action by CEC is ill advised and could even be counter productive to a achieving its stated goals.

I further note that many of the comments submitted in this document are not based on a thoughtful expression by the submitter, but are simply the re-statement of an advocacy group.

As one who has been involved with various lighting new product developments over the years, it is seldom to anyone's advantage to subvert market forces and restrict consumer choice, despite claims that such mandatory restrictions will have typically overstated benefits.

If a plateau should be reached in the future attributed only to CRI via a meaningful study with actual data, such a step can easily and quickly be taken at that time.