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Feit Electric Comments Title 20 - Revised Proposed 15 Day Language - Small Diameter Directional Lamps and General Purpose Light Emitting Diode Lamps

Additional submitted attachment is included below.



Manufacturers of Light Bulbs

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Submitted via email: doCKET@energy.ca.gov

Mr. Andrew McAllister
Commissioner
California Energy Commission
1516 Ninth Street
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Feit Electric Comments Title 20 – Revised Proposed 15 Day Language - Small Diameter Directional Lamps and General Purpose Light Emitting Diode Lamps

Dear Commissioner McAllister,

Feit Electric Company is a leading California manufacturer of high-efficiency high quality lamps. We support California's aspirations in terms of transforming the California marketplace to energy efficient lighting and we look forward to working with the California Energy Commission towards this goal. We share, support, and promote the Commission's goal to save energy in the State of California.

Feit Electric Company has completed our review of the proposed 15-Day Language issued January 7, 2016 for Small Diameter Directional Lamps and General Purpose LED Lamps. We are generally supportive of the high quality approach to Title 20 addressing issues of color quality, dimming and longevity and we look forward to working with the commission in resolving some of the specific technical nuances towards making this a strong effective standard.

With this understanding, we appreciate the opportunity to submit the following information:

1. Feit Electric Company supports the Commission's goal that requires LED lamps to meet the consumer's expectations for quality and performance. We understand and support the Commission's belief that higher CRI lamps will satisfy the consumer. The changes required to meet the new minimum 82 CRI and 2-tiered efficacy requirements will be challenging and will take a concerted effort with LED chip suppliers, but we believe that it is possible.
2. We believe that establishing and maintaining an individual color score on the R8 value of 72 or greater is not possible for mass production lamps with a CRI less than 90. We have evaluated our products and many other lamps currently available on today's market and have found only 90 CRI lamps are reaching this high benchmark. It would seem the Commission is effectively setting the minimum CRI at 90 to achieve this high R8 value. We strongly recommend maintaining an individual R8 color score of 50 or higher.
3. Regarding Standby Power for Connected lamps, Feit Electric believes that 0.2W maximum is overly restrictive for this emerging technology. Energy Star Lamps version 2.0 sets the maximum at 0.5W and we believe this is an obtainable level. We are concerned that by setting a 0.2W maximum, California many hinder continued adoption of this dynamic and growing technology within the State.

Thank you for your time and consideration.

Best regards,

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