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Nichia Comments on Title 20

Additional submitted attachment is included below.

Friday, January 22, 2016

To: McAllister
Commissioner
California Energy Commission
1516 Ninth Street
Sacramento, California 95814

Docket No. : 15-AAER-6, Small Diameter Directional LED Lamp and General Purpose LED Lamp

Dear Commissioner McAllister

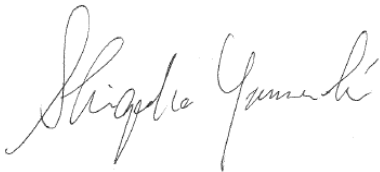
We appreciate the opportunity to comment on the California Energy Commission's proposal. Nichia Corporation the largest LED manufacture in world. While we are headquartered in Japan, we do work very closely with our US Lighting customers to support LED implementation in US Lighting market.

With great appreciation to the California Energy Commission's efforts to implement high quality products in the market, we would like to offer our following comments:

- Regarding the CRI requirement a CRI(Ra) of 82 or greater and R1 –R8 requirements, it is truly uncommon for LED components.
 - The industry has already long accepted a Minimum Ra of 70 or 80 or 90 at the LED and fixture level requirements.
 - All LED Manufacturers are currently making LEDs to this standard.
 - By going against the industry standard, Title 24 is forcing manufacturers to either:
 - a. Use 90+ CRI LEDs: This equates to higher costs and lower efficiencies.
 - or
 - b. LED manufactures will need to completely modify and customize phosphor combinations solely for the purpose of Title 24. This also brings higher costs and lower efficiencies.
- *** These cost barriers will make for slower adoption.*

Nichia strongly requests the CEC to simply align with the industry standard requirements by setting the minimum at CRI 80, instead of 82 and eliminate the R1-R8 requirement so to reduce the additional cost and efficiency barriers.

Best Regards,



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