american lighting association



January 29, 2015

Mr. Andrew McAllister
Commissioner
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

Submitted via email to: docket@energy.ca.gov

**Comments from the American Lighting Association on the Draft Language for the Residential Building Energy Efficiency Standards and Associated Documents (Title 24). Docket: 14-BSTD-01**

Submitted via e-mail

Dear Commissioner McAlister,

The American Lighting Association (ALA) submits the following comments on behalf of its members as a follow-up to comments submitted on June 24, 2014 for the residential lighting portion of the standard.

We appreciate the hard work that has gone into this 2016 update of the standard and, especially, the efforts made to simplify some of the luminaire and application requirements such as the elimination of the formulae for the number of high-efficacy luminaires per room. The changes to allow screw-based luminaires with high-efficacy lamps is also appreciated. This will allow manufacturers to rapidly test, approve and bring to market thousands of fixture models that are known to be acceptable and attractive to consumers. Doing so will enhance consumer choice, lower prices and improve the acceptance of permanently-wired indoor and outdoor high-efficacy lighting. We view integral LED lamps and light engines to not only be the best engineered and performing products available so far, but also, given the ongoing improvement and cost reductions, they will become even more attractive to specifiers, contractors and users. Making them available in familiar and standard forms can only accelerate adoption and user satisfaction with these new products.

Specific Comments

1. Section 150.0 (k) 1.C.v. We believe that screw-based lamps should be allowed in all fixture types, including downlights, and the allowable bulb types regulated according to their efficacy or wattage rather than their base configuration. Requirement "v." limits the choice of products, restricts manufacturers from providing smaller, less expensive fixtures and is

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prescriptive rather than functional which limits new product development for this important luminaire type.

2. Section 150.0 (k) 1. G. ii. This section reads, "The luminaires shall contain lamps that comply with Reference Joint Appendix JA8 and". We believe this wording may be interpreted to indicate that luminaires must be sold with lamps installed in the sockets of the luminaire. This is an unusual industry practice for screw-based lamps and would result in potential damage to both the lamps and the luminaire. We ask that the language be clarified so that lamps that comply with Reference Joint Appendix JA8 are "supplied" with the luminaire.

3. JA8.5 Marking. The ALA is in agreement with NEMA (NEMA Comments dated 12/22/14) regarding the requirements to mark the individual lamps and fixtures with burdensome, special, California-only markings which raise costs and complicate ordering, shipping and stocking such products.

4. JA8.4.4/ Color Temperature. It is good to see that CCT values can be "3000 Kelvin or less…", but the restriction on Duv doesn't allow for the utilization and ongoing development of "warm dim" or other products where the user may wish to vary the CCT to suit the application.

5. Section 150.0(k).2. J. The ALA supports the use of controls as way to achieve greater energy-efficiency, however the use of occupancy sensors in bathrooms would prove to be overly burdensome.

The ALA thanks you and the Commission for this opportunity to comment.

Respectfully,

Eric Jacobson

Eric Jacobson
President/CEO

The American Lighting Association is a trade association representing over 3,000 members in the lighting, ceiling fan and controls industries in the United States, Canada and the Caribbean. Our 134 California members consist of 18 designers, 4 associate members, 29 manufacturers, 25 manufacturers' representative companies and 58 retail companies with 103 store locations.