

DOCKETED

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Comment Received From: NEMA/Kevin J. Cosgriff

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Proposed Amendments to Appliance Efficiency Regulations

Additional submitted attachment is included below.



National Electrical Manufacturers Association

KEVIN J. COSGRIFF

President and Chief Executive Officer

January 22, 2016

Commissioner Janea Scott
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814

RE: Docket No.15-AAER-6, Proposed Amendments to Appliance Efficiency Regulations relating to Certain General Service LED Lamps

Dear Commissioner Scott:

It is not the practice of the National Electrical Manufacturers Association (NEMA) to write directly to each individual commissioner about a rulemaking. The potential negative impact to California and its consumers, however, warrants our exception in this case. To our knowledge, this will be the first time that the CEC pursues regulatory action that will **reduce potential energy savings, increase the cost of energy saving products for California consumers and make it less likely that California consumers will want to buy these products.**

As detailed in our submitted comments (copy enclosed), the proposed Amendments to Appliance Efficiency Regulations relating to certain General Service LED lamps are inconsistent with the CEC mission. We are appealing to you to halt the adoption of 15-day language currently scheduled for your January 27, 2016 business meeting. The proposed changes to Title 20 are based on poorly analyzed data of the emerging LED lamp market.

Numerous studies affirm that the largest impediment to adoption of LEDs has been price. LED prices have dropped substantially since this rulemaking began while at the same time consumer LED adoption rates have been increasing. Today's market price of general service LED lamps is nearing parity with the product they are primarily intended to offset, the halogen incandescent lamp. And their price is continuing to fall. By contrast, CEC staff analysis acknowledges the proposal will *INCREASE* the price of LED lamps and that the proposed designs are less energy-efficient than today's more popular LED options.

Adjusting the U.S. EPA ENERGY STAR data for LED-qualified products reveals over 188 million LED bulbs sold last year -- a 237% percent increase in sales over 2014. The adoption of LED bulbs by consumers is rapidly moving forward and the 15-day language cannot but have a negative effect on this growth, the efficiency gains that accompany them and the prices citizens of California have to bear.

Thank you for your time and consideration of our point of view regarding the proposed amendments. The rule would be a serious mistake and does not represent sound policy. Therefore, please vote "No" on the adoption of the subject 15-day language.

Sincerely,

A handwritten signature in black ink that reads 'Kevin J. Cosgriff'. The signature is written in a cursive, flowing style.

Kevin J. Cosgriff
President & CEO

National Electrical Manufacturers Association
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