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Comment Received From: Sunrise Lighting, Inc.

Submitted On: 2/23/2016

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CEC-Title 20 Support Letter

Additional submitted attachment is included below.

Docket Unit
California Energy Commission
Docket No. 15-AAER-6
1516 Ninth Street, MS-4
Sacramento, CA 95814

January 22, 2016

Sunrise Lighting, Inc. Comments on Small Diameter Directional LED
Lamps and General Purpose LED Lamps – Express Terms 15 Day Language

Dear Commissioner McAllister:

We welcome the opportunity to offer comments in support of the California Energy Commission's (CEC) proposed Title 20 standards for general service light emitting diode (LED) light bulbs.

Our company is LED manufacturer and distributor. We are in lighting business for over 15 years. Currently our LED products include LED A-Lamp, LED BR and LED PAR lamps. Our factory is based in China for the last nine years with over 260 workers there. Also, we have our shipping facility in Los Angeles area. Our headquarters is based in Gilbert, Arizona.

We support the CEC's proposal to require LED lamp products sold in California provide a minimum level of performance and quality to help ensure that they will meet consumer expectations and help make LEDs viable replacements for incandescent lighting in all applications. Specifically, we emphasize our support for the CEC's requirements for accurate color rendition. We support the proposed minimum color rendering index (CRI Ra) score of 82, as well as the proposed minimum individual color scores (R1-R8) of 72. These requirements will result in better rendition of red hues, which has been lacking from most energy saving light sources to date. Red content is especially important for the rendition of food, skin tones, wood furniture and other natural materials.

Combined with the proposed efficacy requirements, the CEC's standards also ensure that LED lamps will be extremely energy efficient and will save consumers on their energy bills. Products that meet these requirements are available and affordable already today – given another two years before the effective date, there will be even more product availability and even lower prices.

The CEC's proposed standards support the State's goals of widespread replacement of energy-intensive incandescent and halogen lamps by requiring that LEDs provide a level of quality and amenity that equals — or exceeds — that of the incandescent technology they are intended to replace. If Californians convert the remaining halogen and incandescent sockets to LEDs¹ the annual energy savings would be enough to meet the State's lighting energy reduction goals mandated by AB1109.²

We realize we are one business day past the comment period, but we ask that you consider our position of support.

Regards,

Taylor Wang
480-892-2966

¹ Halogen and incandescent lamps still represent over 50% of NEMA lamp sales nationally as of Q1 2015.
<https://www.nema.org/news/Pages/First-Quarter-Proves-to-be-a-Mixed-Bag-for-Consumer-Lamp-Indexes.aspx>

² Assembly Bill 1109, signed into law in 2007, sets a target of a 50% reduction in statewide residential lighting energy use (relative to 2007 levels) for indoor residential lighting.