



Dockets #15-BSTD-01 and #15-CALG-01

California Title 24 15-day language

June 8, 2015

California Energy Commission

**DOCKETED**

**15-CALG-01**

TN # 75898

JUN 08 2015

To whom it may concern:

Progress Lighting respectfully requests the Board reconsider the changes in Title 24 with respect to controlling outdoor lighting in residential applications [Section 150.0(k)3] Specifically, the new requirement that the luminaire be controlled by a photocell is problematic. Below are some images from lamps readily available in the market. The warnings of incompatibility are typical and not unique to any specific brand. The problem arises largely from two sources (1) inability of photocells to distinguish environmental light from artificial light and (2) cycling caused by #1 which in turn causes premature lamp/ballast failure.

To further explain point 1, it must be understood that for "decorative" fixtures that are commonly used for residential applications, it can be difficult to position the photocell to avoid exposure to indirect lighting caused by reflections off adjacent surfaces. The photocell cannot distinguish between this reflected artificial light and actual environmental ambient light. Because of the widespread complaints from photocells, EPA removed photocells as a requirement with the release of the v1.0 standard in 2013.

Regards,

David Peek, Product Manager

ENERGY SAVING/3000K

# MLS13GU30 GU24 SpiraMax

## LIMITED WARRANTY:

3 Year warranty from date of purchase.

Suitable for damp locations. Reliable

operating temperature is -10°F ~ 140°F.

Do not use with dimmers, timers, and other control devices. Manufactured in China under license from MaxLite, USA.

This product complies with part 18 of

FCC rules, but may cause interference with radios, televisions, wireless telephones and remote controls.

If interference occurs, move the product away from the device or plug into a different outlet. This class [B] RFLD complies with the Canadian standard ICES-005.

1000 019 045



120 volts | 14 watts | 5000 K

**Lighting Facts** Per Bulb

Brightness	850 lumens
Estimated Yearly Energy Cost	\$1.69
Based on 3 hrs/day, 11¢/kWh Cost depends on rates and use	
Life	18.2 years
Based on 3 hrs/day	
Light Appearance	
Energy Used	14 watts

**Contains Mercury**  
For more on clean up and safe disposal, visit [epa.gov/cfl](http://epa.gov/cfl).



**LAMP CONTAINS MERCURY:**  
Manage according to Local, State, or Federal Disposal Laws.  
See: [www.lamprecycle.org](http://www.lamprecycle.org) or call 1-800-378-6998

Minimum starting temperature: 20°F (-28.9°C)

This device complies with Part 15 of the FCC rules. If interference occurs have this product away from the device or plug into a different outlet. This product may cause interference with some equipment that is not shielded or designed to receive communications equipment operating between 0.45-30MHz.

**ENCLOSED FIXTURE REQUIRED FOR OUTDOOR USE. THIS DEVICE IS NOT INTENDED FOR USE WITH EMERGENCY EXIT LUMINAIRES OR EMERGENCY EXIT LIGHTS, PHOTOCENTROLS, ELECTRIC TIMERS OR DIMMERS.**

**3 YEAR LIMITED WARRANTY:** Return of defective products required for warranty claims. Duration of Limited Warranty based on average daily use of 3 hours. Limited Warranty voided for misuse of products per caution statements. For complete limited warranty details call 1-800-378-6998.

- † This 14 watt Compact Fluorescent bulb provides light similar to a 60 watt A19 incandescent bulb while generating less heat
- \* based on 3 hours average use per day
- \*\* based on 11 cents per kilowatt hour as compared to a halogen bulb



Feit

## CAUTION

Use only on 120 volts 60Hz circuits. Not for use where directly exposed to the weather. Starting temperature -20°F. Optimum operating temperature -10°F to 140°F. This device is not intended for use with emergency exit fixtures or emergency exit lights. Do not use with dimmers, photocontrols or electronic timers. Never use more than 25 lamps per 20 amp branch circuit. This product complies with Part 18 of FCC rules, but may cause interference with radios, televisions, wireless telephones and remote controls. If interference occurs, move the product away from the device or plug into a different outlet. This class [B] RFLD complies with the Canadian standard ICES-005.