

DOCKETED

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On CEC Draft Staff Report - Analysis of Proposed Energy Efficiency Standards

Additional submitted attachment is included below.

Appliance Standards Awareness Project

August 26, 2019

Honorable Andrew McAllister
Commissioner
California Energy Commission
1516 Ninth Street
Sacramento, CA 95814-5512

Dear Commissioner McAllister,

Please consider the following comments by the Appliance Standards Awareness Project (ASAP) on the California Energy Commission draft staff report “Analysis of Proposed Energy Efficiency Standards for Linear Fluorescent Lamps Exempt from Federal Regulation.” We applaud the CEC’s pre-rulemaking process for this product category and encourage the CEC to set California state energy efficiency standards for such lamps.

The linear fluorescent lamp is the dominant lighting technology used in commercial and industrial buildings in California and nationwide and holds a significant share of the residential sector lighting market. Current US Department of Energy (DOE) minimum energy performance standards (MEPS) for general service fluorescent lamps (GSFL) prohibit the manufacture or importation of non-compliant lamps. The most recent update to these federal GSFL MEPS came into effect on January 26, 2018.

As reported in our comments of May 24, 2018 to this docket, the federal GSFL MEPS have been significantly undercut by a loophole in the standard. To address this problem, ASAP proposed that the CEC establish California state energy efficiency standards for linear fluorescent lamps with color rendering index of 87 or higher. We also recommended that the CEC give serious consideration to the proposal included in the Codes and Standards Enhancement (CASE) Initiative Analysis of Standards Proposal for Federally Exempted Linear Fluorescent Lamps, prepared by the California investor owned utilities.

CEC should adopt the proposed standards for linear fluorescent lamps that are exempt or excluded from federal regulation.

ASAP supports the proposal in the draft staff report to establish standards for “high-CRI fluorescent lamps” and “impact-resistant fluorescent lamps.” These standards will significantly decrease the exploitation of current and potential future loopholes in the federal GSFL standards in California. ASAP also supports the CEC staff proposal to establish standards for “state-regulated less than 4-foot linear lamps” which are excluded from the federal GSFL standards. We believe that the proposed CEC standards will help the federal GSFL MEPS realize their maximum energy savings potential in California and other states that adopt similar regulations.

CEC should include cold temperature fluorescent lamps in the proposed standards.

CEC staff included an updated definition for “cold temperature fluorescent lamps” in the staff report but did not provide an analysis of this product category or propose to include it in the standards. The experience with high-CRI fluorescent lamps shows how rapidly a seemingly minor sub-category can be exploited by manufacturers to create a large loophole in the federal GSFL standards. We remain concerned that lighting manufacturers may introduce cheap, low-efficiency T12 and T8 linear fluorescent lamps that meet the definition of cold temperature fluorescent lamps and are therefore exempt from California standards.

We are not aware of any technical or cost barriers that would prevent cold temperature fluorescent lamps from meeting the proposed standards. Light emitting diode technology can be even more energy efficient and

has already found broad application in outdoor luminaires which also tend to use cold temperature fluorescent lamps. Including cold temperature fluorescent lamps in the proposed standard at this stage of the pre-rulemaking would give manufacturers an opportunity to provide information on any technical or cost barriers and the CEC could then reconsider the inclusion of cold temperature fluorescent lamps in the standard prior to publication of 45 day language.

Thank you for the opportunity to comment.

Sincerely,

A handwritten signature in cursive script that reads "Christopher Granda". The signature is written in black ink and is positioned below the word "Sincerely,".

Chris Granda
Senior Researcher/Advocate
Appliance Standards Awareness Project (ASAP)