

DOCKETED

Docket Number:	18-AAER-08
Project Title:	Federally Exempted Linear Fluorescent Lamps
TN #:	229544
Document Title:	Signify North America Corporation Comments - Draft Staff Report - Analysis of Proposed Efficiency Standards
Description:	N/A
Filer:	System
Organization:	Signify North America Corporation
Submitter Role:	Public
Submission Date:	8/26/2019 2:24:27 PM
Docketed Date:	8/26/2019

*Comment Received From: Signify North America Corporation
Submitted On: 8/26/2019
Docket Number: 18-AAER-08*

Signify Comments - Draft Staff Report - Analysis of Proposed Efficiency Standards for Linear Fluorescent Lamps Exempt

Additional submitted attachment is included below.



August 26, 2019

Submitted electronically

Ms. Sohelia Pascha, Ph.D.
California Energy Commission
1516 Ninth Street
Sacramento, California 95814

Docket No.: 18-AAER-08

RE: Comments on Draft Staff Report - Analysis of Proposed Efficiency Standards for Linear Fluorescent Lamps Exempt from Federal Regulation

Dear Dr. Pascha:

Signify (formerly Philips Lighting) appreciates the opportunity to comment on the draft staff report. Our detailed comments follow.

Signify is a global leader in lighting products, systems and services. Our understanding of how lighting positively affects people coupled with our deep technological know-how enable us to deliver digital lighting innovations that unlock new business value, deliver rich user experiences and help to improve lives. Serving professional and consumer markets, we sell more energy efficient LED lighting than any other company. We lead the industry in connected lighting systems and services, leveraging the Internet of Things to take light beyond illumination and transform homes, buildings and urban spaces.

Please contact me if you have any questions.

Sincerely,

A handwritten signature in black ink that reads 'Anthony Serres'.

Anthony W. Serres, LC
Manager, Technical Policy
Signify North America Corporation

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Comments

Draft Staff Report - Analysis of Proposed Efficiency Standards for Linear Fluorescent Lamps Exempt from Federal Regulation

Docket No.: 18-AAER-08

August 26, 2019

Signify welcomes the opportunity to comment on the draft staff report. Our general observations about this subject are below. Detailed comments on specific topics follow.

As a member of the National Electrical Manufacturer's Association (NEMA), we support and echo the comments they submitted on this subject.

General Comments

- We want to make it clear that a T12 linear fluorescent lamp cannot meet the minimum average lamp efficiency proposed in Table K-10. It is not technically possible.
- With regard to the stock and shipment data in Table 8-1 for 4-foot T12 lamps, our sales data indicate a double digit decrease in T12 sales year over year. Thus, we question the roughly 7% decrease shown in the Table.
- The proposed regulation will force a transition from linear fluorescent product to TLEDs. We encourage the CEC to work with California utilities to support this transition with rebates for TLEDs.

Detailed Comments

UL Type-B Linear Lamps

On page 36 of the draft we suggest you change 'null and line wires' to 'neutral and line wires'.

Incremental Cost

The draft Staff Report describes incremental costs as "... the initial additional costs that consumers pay for installing a compliant product in place of a non-compliant product. The cost of the compliant lamps in this analysis includes the cost for the parts, installation, sales tax, and disposal of the removed ballasts."¹

¹ Pasha, Soheila. 2019. *Analysis of Proposed Efficiency Standards for Linear Fluorescent Lamps Exempt from Federal Regulation*. California Energy Commission. Publication Number: CEC-400-2019-009-SD, pg 36.

We note that the cost estimates in Table A-2 put the cost of a new ballast at \$4.30 and the labor cost per lamp at \$30.15, so \$60.30 for a two lamp fixture. We believe a more realistic cost for the ballast will be between \$10 and \$20 and maybe an additional \$100 in labor for an electrician to visit a residence.

Marking Requirements

We agree with and appreciate staff's decision not to propose additional marking requirements.

State-Regulated General Service Fluorescent Lamps

Staff found one T8 fluorescent model that could meet the proposed energy efficiency levels and concluded that it is technologically feasible to produce high CRI fluorescent lamps that comply with the proposed standards (without a considerable incremental price). We want to emphasize again, that this is not feasible for T12 lamps. Your conclusion is only valid for T8 lamps.

While lamps with a CRI of 85 may meet the proposed efficacy levels, the conclusion that you can modify such a lamp to achieve a CRI of 87 and still meet the proposed efficacy levels is without technical merit.

END COMMENTS