

**DOCKETED**

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*Comment Received From: LEDVANCE LLC  
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**LEDVANCE LLC comments General Service Lamps Proposed Regulations**

*Additional submitted attachment is included below.*



Patrick Saxton  
California Energy Commission  
Appliances & Existing Buildings Office  
1516 Ninth Street, MS-25  
Sacramento, CA 95814-5512

October 3, 2019

Dear Mr. Saxton:

LEDVANCE appreciates the opportunity to comment to the California Energy Commission (CEC) on the 45-day language that would revise the definition of General Service Lamps in Title 20 and other definitions as proposed in Docket Number 19-AAER-04.

The California Energy Commission (CEC) proposes to add a variety of definitions in a new paragraph (2) to Title 20, §1602(k) including a new definition of “general service lamp” under the heading “General Service Lamps Sold On or After January 1, 2020.”

CEC’s Initial Statement of Reasons notes that this change in definition of general service lamp and other lamps is necessary to (1) “align those definitions established in two DOE final rules published in the Federal Register on January 19, 2017” and (2) “eliminate confusion between lamp types sold before January 1, 2020, and those sold after the effective date of the federal definitions and standards.”

However, on September 5, 2019 a Final Rule was published by the U.S. Department of Energy (DOE) withdrawing the Final Rules published on January 19, 2017. This rule becomes effective on October 7, 2019 and no longer affects the definitions that Congress first established in the Energy Independence and Security Act (EISA) in 2007. Therefore, no changes to the existing definitions will take place on January 1, 2020.

Furthermore, CEC’s proposal will create more confusion, rather than reduce it. The Initial Statement of Reasons states: “Regulations properly and accurately reflect current federal law to avoid confusion and to provide regulated parties and consumers more clarity, accessibility, and regulatory certainty with respect to the federal regulatory language in the Appliance Efficiency Regulations.”

Because the DOE has withdrawn its rule to change the definitions, California must withdraw its own proposal and continue to define general service lamps and general service incandescent lamps as they are defined in the Energy Independence and Security Act (EISA) passed by Congress in 2007.

That is the only way to “properly and accurately reflect current federal law.”

Sincerely,

Jennifer R. Dolin

A handwritten signature in black ink that reads "Jennifer R. Dolin".

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