

**DOCKETED**

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Oral Comments on Proposed General Service Lamps Regulations  
 Title 20, Section 1004 and Sections 1601 – 1609, California Code of Regulations  
 Public Hearing  
 November 6, 2019

Commenter's Name	Comments/ Suggested Revisions	Response
<p>Mary Anderson of PG&amp;E</p>	<p>Good morning. This is Mary Anderson from PG&amp;E, speaking on behalf of the California Investor-Owned Utilities. I am pleased to be here today to strongly support the Energy Commission as you're proposing to implement the expanded general service lamp definitions into the Title 20, California Appliance Efficiency Regulations.</p> <p>The California IOUs and the Energy Commission have a long history of working together to promote high efficiency lighting products in California, going back to the 2006 GSL state standards which laid the framework for the lighting provision in the 2007 Energy Independence and Security Act, or EISA.</p> <p>Per the recommendations of the California Energy Commission, I see it included a provision that allowed California and Nevada to adopt the federal backstop of 45 lumens per watt for GSLs as of January 1st, 2018. After California adopted this federal backstop, DOE, through a proper rulemaking process, expanded the definition of GSL to include additional lamp types. California is expressly permitted to adopt these definitions under the statute and now acts to do so.</p> <p>Not only does the Energy Commission have the right to adopt the expanded scope now, it is imperative that it do so expeditiously to lock in energy savings for Californians. In doing so, California will be joining four other states, Vermont, Colorado, Washington and Nevada, who have already adopted the expanded definition into state law. Of the anticipated 12.7 quadrillion BTUs, or quads, of nationwide energy savings afforded by the implementation of the full</p>	<p>Comment Acknowledged.          No Change.          General Comment of Support.</p>

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	<p>expanded scope, backstop, and sales prohibition on January 1, 2020, 1.4 quads, or 11 percent, of the savings can be attributed to California alone through the year 2050. Further, our analysis strongly suggests that the potential to achieve these savings is front-loaded. If the California effective date is delayed by just two years the 30-years savings total will suffer a 21 percent loss through 2052. The Energy Commission's adoption of these regulations is of the utmost importance for California, Californians, and has the potential to influence the lighting market nationwide through the promotion of money-saving efficient products. Thank you.</p>	
<p>Pierre Delforge of Natural Resources Defense Council (NRDC)</p>	<p>My name is Pierre Delforge with the Natural Resources Defense Council. I am here to comment today that the CEC's propose almost doubles the number of (indiscernible) at homes that are covered by the state's lighting efficiency standards. With these proposals, key categories of lightbulbs, including three-way bulbs, (indiscernible) bulbs, candle- and flame-shaped bulbs, and round globe bulbs are brought into scope and subject to a minimum efficiency standard of 45 lumens per watt. This action will save massive amounts of electricity weight and (indiscernible) a lot of air pollution. According to CEC estimates, California consumers and businesses will save between \$700 million and \$2.4 billion a year while the whole stock turns over. Controversy statements often made by some interested stakeholders, these bulbs are common everyday lightbulbs, not some sort of niche or specialty bulb. Today, energy versions for each of these type of bulbs are widely available in a variety of shapes and brightness levels. (Indiscernible) use only one-sixth of the amount of energy to deliver the same amount of light as (indiscernible) conventional bulbs and they last ten years or longer as a normal operation. The results</p>	<p>Comment Acknowledged. No Change. General Comment of Support.</p>

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		<p>are extremely cost effective and the slightly higher purchase price is typically paid back within six months. So for this, we urge the CEC to move forward with this proposal and to adopt it at the next business meeting. Thank you.</p>	