

DOCKETED

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Lutron Comments to CEC's T20 NOPA Repeal of Self-Contained Lighting Controls

Additional submitted attachment is included below.

23 October 2020

SUBMITTED ONLINE VIA:

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

Lutron Comments to CEC's T20 NOPA Repeal of Self-Contained Lighting Controls

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Dear Commissioner McAllister,

Lutron thanks you for the opportunity to provide the attached comments on the CEC's NOPA to repeal requirements for Self-Contained Lighting Controls in Title 20.

As you may know, Lutron was founded in 1961 and is headquartered in Coopersburg, Pennsylvania. From dimmers for the home, to lighting management systems for entire buildings, the company offers more than 17,000 energy-saving products, sold in more than 100 countries around the world. In the U.S. alone, Lutron products save an estimated 10 billion kWh of electricity, or approximately \$1 billion in utility costs per year. The company's early inventions - including the first solid-state dimmer invented by Lutron's founder Joel Spira - are now at the Smithsonian's National Museum of American History in Washington, DC.

Please find our detailed comments below. We look forward to working with you further on this important project. Please contact me at (610) 282-6468 or at sirving@lutron.com if you have questions or would like more information on these comments. Thanks again for your consideration.


Stephen R. Irving
Standards Development Leader
Lutron Electronics Co., Inc.

Lutron supports the proposed removal of Self-Contained Lighting Controls from Title 20 Appliance Efficiency Regulations as it eliminates redundant requirements and reduces confusion about certifications.

1. Elimination of Redundant Requirements

As stated in the Initial Statement of Reasons (ISoR), requirements for Lighting Controls were transitioned to the Title 24 Building Energy Code during the 2019 revision, leaving duplicative requirements in Title 20. Elimination of these Title 20 requirements was anticipated during that development and continues to be appropriate today.

2. Eliminate Customer Confusion regarding Certification Requirements

Lutron has received several questions about certifications in the MAEDbS for *Systems-Based* Lighting Controls from our customers in California. These customers were accustomed to certifications for our *Self-Contained* Lighting Controls and expected the same for our *Systems-Based* Lighting Controls. One can easily understand their confusion as the two types of controls are frequently used to fulfill the same customer need (use case).

Archiving existing certifications for Self-Contained Lighting Controls in the MAEDbS is the best fix. Customers looking for certifications simply wanted to ensure that they comply with CEC requirements. There is no need to maintain certifications for Lighting Controls.

To prevent further confusion during this transition, we recommend that all existing database entries be archived at the same time and that any MAEDbS searches for Lighting Controls return a simple explanation informing customers that certification is no longer required. This explanation will help prevent concern from customers and retailers who buy, use, and sell these energy-saving devices.