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California Energy Commission

Docket #: 21-BSTD-01, Project Title: 2022 Energy Code Update Rulemaking

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Subject: Energy Focus, Inc. urges the California Energy Commission to retain its 2019 Title 24 flicker standard (JA8.4.6) in its 2022 Title 24 update.

Energy Focus is a publicly traded LED manufacturer for maritime, government, defense, and commercial products. We have our origins in Fiberstars, Inc., a fiber optic lighting manufacturer founded in California. Over the past forty years, our company has stood for innovation – practiced innovation with products that are market leaders and have withstood the most rigorous of standardized tests.

Over the past ten years, our company has relied on academics and organizations like IES, IEEE and the Lighting Research Center at Rochester, NY, to educate ourselves about human health and wellness. The impact that indoor lighting has on occupants' wellbeing and comfort is significant. Flicker's "...risks include seizures, and less specific neurological symptoms including headache, dizziness and general malaise. Seizures can be triggered by flicker in individuals with no previous history or diagnosis of epilepsy."¹

The impact of these effects have been largely mitigated by California's modest requirement to limit flicker to less than thirty percent. We urge the Energy Commission to not deregulate a market that is largely hitting the mark when it comes to meeting California's flicker requirement. Removing the JA8.4.6 standard on flicker would allow for a flood of poorly-made, high-flicker, and potentially health-compromising lamps to enter the marketplace – and rob California of its role as a thought leader in the world of building efficiency and human-centric design.

Sincerely,



John M Davenport

Chief Scientist

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¹ A. Wilkins, J. Veitch and B. Lehman, "LED lighting flicker and potential health concerns: IEEE standard PAR1789 update," 2010 IEEE Energy Conversion Congress and Exposition, 2010, pp. 171-178, doi: 10.1109/ECCE.2010.5618050.