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Sierra Club CA comments on T24 Residential Lighting

Additional submitted attachment is included below.



July 1, 2021

California Energy Commission
Docket Unit, MS-4
Docket No. 21-BSTD-01
1516 Ninth Street
Sacramento, California 95814-5512
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Re: 21-BSTD-01 2022 Energy Code Update Rulemaking

Dear Commissioners,

Sierra Club California thanks you for giving us the opportunity to comment again on the proposed Express Terms for the 2022 Title 24 part 6 building energy efficiency standards. Besides advocating for the health of the environment, the Sierra Club advocates for the health of people.

Sierra Club California would like to reiterate the concerns raised earlier this year in the EIR docket¹ about the weakening of lamp flicker requirements in in the proposed 2022 Energy Code and other overall weakening of the JA8 residential high efficacy lighting labelling requirements in the standard. Instead of rolling back these standards the Commission should be considering how to make these standards more protective, not less.

What is currently being proposed is not a simple “clean-up” or clarification of the proposed standards but a significant weakening of the residential lighting standards that is not in the public interest. Replacing the testing, disclosure and labelling requirements in JA8 with the less stringent Title 20 lamps standards that do not require flicker level disclosure or labelling is not equivalent, it is less protective.

The comments submitted by Edward Moreno on behalf of Sierra Club California from three years ago are still valid.² *“In 2016, the Commission adopted a conservatively high (lax) flicker standard in Joint Appendix JA8 of Title 24 due to there being little information on the flicker characteristics of products on the market. However, the 2016 Title 24 standard required that products installed into new homes be tested for flicker and the data posted in a public (JA8) database which could be directly compared against the IEEE PAR 1789 Standard, “Recommended Practices for Modulating Current in High-Brightness LEDs for Mitigating Health Risks to Viewers.” It should be noted that the IEEE standard recommends half the flicker value than the current Title 24 criteria. Close to 10,000 products complying JA8 have posted their data. We recommend this data be analyzed and the results considered on whether the current Title 24 required flicker value should be dropped to*

¹ <https://efiling.energy.ca.gov/GetDocument.aspx?tn=237523&DocumentContentId=70727>

² <https://efiling.energy.ca.gov/GetDocument.aspx?tn=221872&DocumentContentId=27325>

a more protective value.” Since three years ago there are six times as many products in the JA8 database but no movement on being more protective.

Also from this same letter, *“We also recommend that the changes to Section 150.0(k) be restored to the original requirements in the 2016 version of Title 24. The proposed changes would render the standards more difficult to enforce and would undermine the JA8 high efficacy specifications by applying them to only some of the luminaires in new homes.”* The draft 2019 express terms in Section 150.0(k) included striking the reference to JA8 for recessed downlights or for screw based luminaires.³ The current proposal for 2022 would be even worse as it would apply to all Title 20 general service LEDs which covers some LED lamps but not others and would similarly undermine the JA8 high efficacy standards.

In summary, we recommend that the CEC remove these harmful changes to Table 150.0-A, Table 160.5-A, Section 150.0(k)1B and Section 160.5(a)1B. Additionally, we request again that for the next code cycle the Commission carefully evaluate the current consumer protections in JA8 and include all interested parties in the evaluation how these can be updated based on the latest science on human health and energy efficiency.

Sincerely,



Lauren Cullum
Policy Advocate

³ <https://efiling.energy.ca.gov/GetDocument.aspx?tn=221252&DocumentContentId=27203>