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*Comment Received From: Alex Boesenberg
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**Docket number 21-BSTD-01 - Notice of Proposed Action 2022
Energy Code Changes, 15-Day Express Terms**

Additional submitted attachment is included below.



National Electrical Manufacturers Association

PHILIP A. SQUAIR

Vice President, Government Relations

July 28, 2021

Online via: <https://efiling.energy.ca.gov/EComment/EComment.aspx?docketnumber=21-BSTD-01>

Mr. Payam Bozorgchami, PE
Senior Civil Engineer
California Energy Commission
Building Standards Office, Efficiency Division
1516 9th Street, MS-4
Sacramento, CA 95814

NEMA Comments on Notice of Proposed Action 2022 Energy Code Changes, 15-Day Express Terms

Docket Number: 21-BSTD-01

Dear Mr. Bozorgchami:

As the leading trade association representing electrical and medical imaging manufacturers, the National Electrical Manufacturers Association (NEMA) submits these comments to the CEC Notice of Proposed Action for the Title 24 Building Energy Efficiency Regulations. These comments are submitted on behalf of NEMA Lighting Division Member companies.

NEMA represents some 325 electrical equipment and medical imaging manufacturers that make safe, reliable, and efficient products and systems. Our combined industries account for 370,000 American jobs in more than 6,100 facilities covering every state. Our industry produces \$124 billion shipments of electrical equipment and medical imaging technologies per year with \$42 billion exports.

We count on your careful consideration of these comments. Our Members look forward to an outcome that meets their expectations. If you have any questions on these comments, please contact Alex Boesenberg of NEMA at alex.boesenberg@nema.org.

Sincerely,

A handwritten signature in black ink that reads "Philip A. Squair". The signature is written in a cursive, slightly slanted style.

Philip Squair
Vice President, Government Affairs

NEMA Comments on Notice of Proposed Action 2022 Energy Code Changes 15-Day Express Terms

NEMA Comments:

1. We disagree with the decision to amend 45-day language to deny recognition of equivalency between Joint Appendix 8 and Title 20 qualified lamps for the purpose of conformance to Title 24. CEC should reverse its late-proceedings decision and restore line #5 of Table 150.0-A to recognize equivalency between Title 24 and Title 20 qualified products. As CEC stated in the Initial Statement of Reasons¹ for this proceeding, it is time for a “new generation of light source technologies for residential building lighting applications [to be] considered for their relevancy and physical characters”. By striking former line #5, CEC is essentially stating that its Title 20 requirements are not sufficient to ensure quality in LED lighting appearance and/or performance. Furthermore, because a primary purpose of code amendment proposals should be to reduce confusion and to improve conformance and energy savings, formalizing a mismatch between Title 20 and Title 24 Light Sources would only serve to perpetuate confusion.
2. Commenters to the 45-day Express Terms who argued against the recognition and acceptance of Title 20 certified lamps within Title 24 lack substantive evidence of any consumer issues that remain to be resolved by CEC action. Sales of Title 20 compliant lamps far exceed those of Title 24 compliant lamps. The lack of consumer complaints about performance of Title 20 products proves they are acceptable. In contrast, there will be a burden placed on consumers as a result of manufacturers having to maintain two separate product lines to satisfy Title 24 and Title 20 as well as increased potential for confusion among consumers and builders. It makes no sense for California to have one requirement for consumers and another for builders especially when the Title 20 requirements have been more than validated by market acceptance. Put another way, there is a burden associated with having two competing databases as well as confusion and costs associated with this practice. Unfortunately, this burden of the competing/conflicting databases will not be offset by any perceptible consumer benefit.
3. For clearer recognition of products certified to the Title 20 Modernized Appliance Efficiency Database System (MAEDbS), after CEC restores the language of line #5, NEMA proposes the addition of the words “Title 20 LED Lamps listed in the MAEDbS” to Table 150.0-A.
4. Also in Table 150.0-A, NEMA opposes the proposed strikeout of the words “accent, display, utility, undercabinet or special effect” to line #2. This strikeout is related to the decision to maintain disagreement and confusion between Title 20 and Title 24 qualified light sources. Once CEC restores the 45-day proposal language to eliminate the mismatch between Title 20 and Title 24 light sources in response to our arguments above, these categories can be restored.

¹ <https://efiling.energy.ca.gov/GetDocument.aspx?tn=237716&DocumentContentId=70938>