DOCKETED	
Docket Number:	17-AAER-12
Project Title:	Low-Power Mode
TN #:	240041
Document Title:	Signify Comments to CEC LPM Roadmap
Description:	N/A
Filer:	System
Organization:	Signify
Submitter Role:	Public
Submission Date:	10/11/2021 2:21:10 PM
Docketed Date:	10/11/2021

Comment Received From: Anthony Serres
Submitted On: 10/11/2021
Docket Number: 17-AAER-12

Signify Comments to CEC LPM Roadmap

Additional submitted attachment is included below.

October 11, 2021

Submitted via e-mail

Dr. Andrew McAllister
California Energy Commission
1516 9th Street, MS-4
Sacramento, CA 95814

Signify comments on the Low Power Mode Data Collection Procedure

Docket Number: 17-AAER-12

Dear Dr. McAllister:

Signify (formerly Philips Lighting) appreciates the opportunity to comment on Data Collection Procedure of the low power mode roadmap.

Signify is a global leader in lighting products, systems and services. Our understanding of how lighting positively affects people coupled with our deep technological know-how enable us to deliver digital lighting innovations that unlock new business value, deliver rich user experiences and help to improve lives. Serving professional and consumer markets, we sell more energy efficient LED lighting than any other company. We lead the industry in connected lighting systems and services, leveraging the Internet of Things to take light beyond illumination and transform homes, buildings, and urban spaces.

Please contact me if you have any questions.

Sincerely,

Anthony W. Serres, LC
Manager, Technical Policy
Signify North America Corporation

c: (202) 412-6143
e: anthony.serres@signify.com

Our global brands are

PHILIPS interact

Comments

2021 Data Collection Procedure

Low Power Mode Roadmap

October 11, 2021

1.- Overall low power mode data collection procedure.

Measuring standby power requires a consensus methodology approach, as we have suggested in our document **Philips Technical Response for Low Power Mode and PF** , #221190 dated 9/15/2017.

The IEC 62301 standard does not apply to lighting systems equipment or lighting systems. Some researchers are misusing it to report on connected lamps' standby power. This practice will obscure comparisons with other international researchers' reports because the testing methodology is different.

The proposed low power mode data collection procedure will benefit from describing the specific testing procedures to be used by each particular appliance and system.

2.- Low power mode data collection scope.

The low power mode data collection may yield more useful results if it shifts focus from appliances to systems. The aggregation of different appliances that may be tested under different test procedures may not be a good indication of the system's actual low power mode consumption. The overall system has the ability to overwrite the appliances' self-designed status by definition. A Wi-Fi repeater may be forced to remain in high response mode if the system continues to query it; even when the repeater may have a low power mode capability, the system will never allow the repeater to enter in this mode.

3.- Lighting Systems and Devices Low Power Mode testing Methods

Neither the Standard CTA 2049 Determination for Small Network Equipment Average energy Consumption nor the IEC standard 62301 are applicable to lighting devices and systems. Rather, Lighting devices and systems shall be tested using the ANSI C82.16 or the ANSI C137.63103

END COMMENTS