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| Docket Number: | 15-AAER-06 |
| Project Title: | Small Diameter Directional LED Lamps and General Purpose LED Lamps |
| TN #: | 207178 |
| Document Title: | Philips Lighting Preliminary Comments on Title 20 - 15 Day Language |
| Description: | N/A |
| Filer: | System |
| Organization: | Philips Lighting |
| Submitter Role: | Public |
| Submission Date: | 1/4/2016 3:40:05 PM |
| Docketed Date: | 1/4/2016 |

Comment Received From: Philips Lighting

Submitted On: 1/4/2016

Docket Number: 15-AAER-06

Philips Lighting Preliminary Comments on Title 20 - 15 Day Language

Additional submitted attachment is included below.



January 4, 2016

Submitted via e-docket

Mr. Andrew McAllister
Commissioner
California Energy Commission
1516 Ninth Street
Sacramento, California 95814

Docket No.: 15-AAER-6

Preliminary Comments on Title 20 - 15 Day Language - Small Diameter Directional Lamps, General Purpose LED Lamps, and Portable Luminaires

Dear Commissioner McAllister,

Philips Lighting has completed our initial review of the proposed 15-Day Language issued December 28, 2015 for Small Diameter Directional Lamps, General Purpose LED Lamps, and Portable Luminaires.

We greatly appreciate that the Energy Commission has carefully reviewed our comments, and those from industry, on the 45 Day language. As indicated in those comments, there were many difficulties in meeting the proposed requirements.

Thus we are pleased to support the following text that appears in the 15 Day language:

(C) State-regulated LED lamps with lumen output of ~~150 lumens or greater~~ less than 150 lumens for candelabra bases, or less than 200 lumens for other bases, and manufactured on or after January 1, ~~2017~~ 2018, shall have:



1 We applaud the Energy Commission for taking a gradual approach to implementing the onerous
2 requirements that appeared in the 45 Day language. By introducing the requirements with
3 lamps that produce less than 200 lumens, the Commission now has two opportunities to
4 evaluate market adoption:
5

- 6 • Will manufacturers see sufficient interest from the market to produce lamps at 200
7 lumens or below that meet all the requirements in the 15-day Title 20 language? If so,
8 then it indicates that the requirements are becoming easier to meet. Extending the
9 requirements to higher lumen products may then be desirable.
- 10
11 • Will consumers adopt lamps that do not meet the requirements proposed in the 45 day
12 language? Since the 15-day language will allow sale of products above 150/200 lumens
13 that do not meet those requirements, the Commission can evaluate consumer adoption
14 of products with performance lower than the 45-day language. Information from this
15 study may result in future changes to the requirements, if consumer adoption is
16 deemed to be sufficiently high without them.

17

18 We are still evaluating the remainder of the 15 Day language and will issue additional
19 comments by the January 12th deadline. If you have any questions about these comments, my
20 contact information is below.

21

22 Sincerely,



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26 Philips Lighting

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