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Comments to Docket Number 15-AAER-06

Dear Commissioners.

I am writing to express my non-support of the CEC's proposed 15-day language for LED general service lamps and Small Diameter Directional Lamps.

The CEC's arguments display clear bias towards a very specific product design, despite no credible evidence to justify the proposed measures. The CEC has failed to prove there is a problem with consumer acceptance of 80 CRI LED lamps that needs to be solved. In fact, ENERGY STAR and other sources point to ever-increasing sales as consumers embrace the growing number of high quality 80 CRI LED lamps constantly being introduced at consumer friendly pricing in the market.

The CEC's decision to continue down the path of an argument based on consumer satisfaction ignores the skyrocketing sales figures for 80 CRI LED bulbs and the overwhelmingly positive consumer reviews about these products. Ignoring these facts showcases the CEC's unwillingness to admit they no longer have a problem to solve with LED bulbs.

While there is no longer a problem with LED bulb adoption across the nation, there are still problems in California; high electricity prices and climate change. Governor Brown recognized these issues in his direction to the State to save as much electricity as possible. How is it then that the CEC is promoting LED bulbs that are both MORE EXPENSIVE and LESS EFFICIENT than those commonly sold today? There is no justification for this and the CEC's insistence on a flawed argument is counter to the State's goals and is a disservice to California residents.

The CEC should not be deciding for citizens what light bulbs they can have in their homes by setting unfounded performance requirements for appearance and color. Instead, the CEC should allow consumers to make the choice for themselves, and respect that some consumers are more cash-conscious than others. The CEC also ignores the fact that the bulbs on the market today are MORE EFFICIENT than the bulbs the CEC is seeking to mandate. This ignores the CEC's primary mission to identify and encourage high-efficiency products.

By seeking to mandate more expensive, less efficient, less desirable (according to sales figures) light bulbs in the market, the CEC is losing touch with their mission to help Californians save energy.

I respectfully call on you to DROP THE 15-DAY PROPOSAL AND CANCEL THE RULEMAKING so that CEC staff can make the revisions to LED general service lamps and Small Diameter Directional Lamps that are aligned with our state goals.