

## DOCKETED

<b>Docket Number:</b>	16-AAER-04
<b>Project Title:</b>	2016 California Quality LED Lamp Specifications
<b>TN #:</b>	214585
<b>Document Title:</b>	ZigBee Alliance Comments: Opposition to 0.2W limit
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	ZigBee Alliance/Tobin Richardson
<b>Submitter Role:</b>	Public
<b>Submission Date:</b>	11/30/2016 1:30:09 PM
<b>Docketed Date:</b>	11/30/2016

*Comment Received From: Tobin Richardson*

*Submitted On: 11/30/2016*

*Docket Number: 16-AAER-04*

## **Opposition to 0.2W limit**

*Additional submitted attachment is included below.*



November 30, 2016

California Energy Commission Docket No. 16-AAER-4  
1516 9th Street, MS-4  
Sacramento, CA 95814

Dear Commissioners:

I am writing to you regarding Docket #16-AAER-4, related to The Voluntary California Quality LED Lamp Specification, and to register our opposition to the proposed 0.2W limit on standby power.

The ZigBee Alliance creates, maintains and delivers open, global wireless standards that enable everyday objects to work together in the Internet of Things (IoT). An open, non-profit ecosystem of more than 400 companies representing 37 countries, the Alliance is developing and promoting the world's leading IoT standards across a wide range of consumer, commercial and industrial monitoring and control applications.

The Alliance believes that overly restrictive limits on standby power consumption of connected LED bulbs may have a stifling effect on the growth and adoption of the IoT, and as a result is detrimental to the industry and consumers. The Alliance is supporting a vision in which a connected lighting network will, in addition to lighting, be leveraged as a ubiquitous platform for sensor-enabled, data-driven applications collectively referred to as the Internet of Things.

Advanced lighting systems will increasingly be equipped with, and provide power to, sensors, computing hardware and firmware and other yet-to-be-determined devices that may have little or no direct relationship to the singular function of lighting. Applications such as presence detection, air quality monitoring, noise or gunshot detection, location tracking, and traffic or people counting, may be an integral part of our connected lighting networks. These innovative applications have the potential of delivering actionable insight about our surroundings yielding tremendous value through improved efficiency, safety, security and wellbeing of our community or home.

This notion of lighting as a 'backbone' capability for the facility (home, commercial building, industrial, smart city) is an important one with wide positive ramifications. The value is quickly increasing, and supported by multiple studies in the improved total energy usage by those buildings and other lighted environments as a direct result of connectivity. These rely extensively on light bulbs, ballasts and other components being an integral part of that new paradigm. The Alliance believes that the metric intended for lighting-only standby power



limits cannot also represent the limit for power consumption of these embedded, high-value IoT applications which, at any point in time, may or may not be in standby mode. Looking at energy usage in isolation of one device is certainly a valid exercise, but taking an overly restrictive approach limits the capability of the network. This very well can have a stifling effect on not only innovation, but the potential facility-wide gains possible. This makes it all the more important that policies consider the larger benefit achieved, and importantly one that recognizes the vital role that lighting is playing in supporting intelligent networks around the world.

The notion of low power is a daily consideration in the technical developments within the ZigBee Alliance, including areas like green-powered devices – those relying not on any energy draw outside of ambient conditions like temperature changes, mechanical ‘button presses’ such as the Philips ‘Hue Tap’, and many others. This innovation to push the envelope in energy management is gaining great traction, driven by demanding building managers to reduce total energy consumption while enabling effective tools, and quickly reducing the construction costs associated with fitting new wires in new build and retrofit scenarios. The landscape of innovative approaches in networking and energy management is already overwhelming with great contributions from all segments.

We hope that the Energy Commission will consider this very broad-reaching effect when establishing policy on standby power restrictions. The industry understands the intricacies here and is acting quickly and effectively to ensure the lowest energy usage for the greatest value to consumers, building managers, and society at large. This really is a unique time in the advent of new technology, and we know the Energy Commission’s goal is in line with supporting the ability to continue on this rapid evolution of technology for our society’s benefit. We therefore respectfully oppose the proposed 0.2W limit on standby power and encourage the Commission to remove this limit.

Respectfully submitted,

Tobin J.M. Richardson  
President & CEO  
ZigBee Alliance