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Docket Number:	16-AAER-04
Project Title:	2016 California Quality LED Lamp Specifications
TN #:	214587
Document Title:	Melissa Obradovic Comments: TCP Comments on Proposed Updates to the Voluntary California Quality LED Lamp Specification
Description:	N/A
Filer:	System
Organization:	Melissa Obradovic
Submitter Role:	Public
Submission Date:	11/30/2016 2:12:42 PM
Docketed Date:	11/30/2016

Comment Received From: Melissa Obradovic

Submitted On: 11/30/2016

Docket Number: 16-AAER-04

TCP Comments on Proposed Updates to the Voluntary California Quality LED Lamp Specification

Additional submitted attachment is included below.



November 30, 2016

Ms. Soheila Pasha
California Energy Commission
1516 Ninth St, MS-4
Sacramento, CA 95814

TCP Comments on Proposed Updates to the Voluntary California Quality LED Lamp Specification
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Dear Ms. Pasha,

Please find TCP's detailed comments below to the Proposed Updates to the Voluntary California Quality LED Lamp Specification version 3 (LED Lamp Specification). TCP appreciates your careful consideration of these comments and the opportunity to voice our concerns.

1. Lumen Maintenance and Rated Life: TCP requests that due to the long duration needed to measure lumen maintenance according to LM-84 (roughly 10 months), CEC should permit manufacturers to estimate lamp life using LM80/TM21 methods until manufacturers have a reasonable amount of time to complete LM84 testing. Therefore, TCP recommends that the LM-84 requirement be implemented concurrent with the timing requirements of Title 20 on January 1, 2018.
2. Proposed implementation date: TCP understands that it is CEC's desire to drive adoption of Title 20 earlier than January 1, 2018, by implementing the proposed specification on January 1, 2017. TCP strongly recommends the CEC to not accelerate adoption of the Title 20 requirements, but rather follow the implementation date of January 1, 2018, for the following reasons:
 - TCP reached out to our major LED suppliers to determine if their standard 80 CRI and premium 90 CRI meet these requirements. The high CRI (>90) meet the proposed requirements of R1-R8 > 72. However, all of our manufacturer's standard 80 CRI LED products failed, as R8 is typically below 70. In addition, most standard 80 CRI products are made with a minimum of 80CRI – not the proposed 82CRI requirement per CEC proposal. Based on discussions with our LED manufacturers, they expect to be able to provide cost effective solutions to meet the proposed CRI requirement, but will need 6-9 months to develop this technology. A January 1, 2018, implementation date will allow LED manufacturers time to respond and develop LED chips to meet the proposed CEC requirements.
 - A January 1, 2017, implementation date would effectively disqualify all existing CEC certified product on the market immediately until the new LM-84 data is available. The removal of CEC certification for existing product would adversely affect all California residents by eliminating available utility rebates on these products, thus increasing the cost to consumers and reducing the adoption of energy efficient lighting in the state of California.
 - In 2016, TCP committed significant time and resources to engineer, manufacture, and distribute a full portfolio of CEC qualified products to the nation's largest retailer of lighting products in support of the CEC Lamps specification. Both TCP and its retail customer have made a significant investment in product in support of furthering the aims of energy conservation in the state of California - including a full supply chain of inventory prepared to support the retailer and their utility programs in 2017.

Alternatively, we urge the CEC to consider exempting products manufactured prior to January 1, 2017, from the new proposed regulations. Rather, products manufactured prior to January 1, 2017, may be allowed to qualify for CEC certification under the regulations in effect at the time of manufacturing.

We thank you for consideration of the above comments to the proposed regulations. We would be happy to discuss any of the above topics with you further.

Sincerely,

Melissa Obradovic
Product Marketing Manager
TCP