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Comment Received From: Skip Ashton
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Silicon Labs comments on Standby Power

Additional submitted attachment is included below.

To:
California Energy Commission
1516 9th Street, MS-4
Sacramento, CA 95814

Subject: Docket No. 16-AAER-4

To whom it may concern:

We submit this letter to register our opposition to the 0.2W limit on standby power that is proposed in the "Voluntary California Quality Light-Emitting Diode (LED) Lamp Specification 3.0" and request an increase in the limit to 0.5W for lamps.

Our company 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 (IoT). Advanced lighting systems will increasingly be equipped with sensors, computing hardware and firmware and other yet-to-be-determined devices and functions that may have little or no relationship to the function of lighting. Applications such as presence detection, air quality monitoring, noise 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.

The goal of regulating standby power for lighting is understandable and reasonable. However, we maintain 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. These connected lights often form the routing backbone of a home or commercial network so while they may be in standby from a lighting standpoint they are active as an IoT device.

There is tremendous potential in the IoT, but overly strict limits on standby power will stunt its potential. California has traditionally been a place where technological innovations first appear and first begin to thrive. However, in the case of IoT, the proposed strict limits on standby power threaten to stifle the development of the IoT. We urge you to increase the allowance for standby power in the Specification to 0.5 W or perhaps more realistically, 1.0 watt.

Sincerely,

Skip Ashton
Vice President of Software
Silicon Labs
940 Stewart Drive
Sunnyvale, CA 94085-3912