

DOCKETED

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Comment Received From: Roy Harvey

Submitted On: 11/30/2016

Docket Number: 16-AAER-04

Increase standby power to enable greater energy savings

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 at least 0.5W.

Energy Star™s Lamps 2.0 and Luminaires 2.0 specs allow 0.5 W standby power. This limit can accommodate sensing and/or wireless connectivity functions. The sensing function could be an occupancy sensor to turn off the light when not needed, thus saving energy. The wireless connectivity function could relay a message from a remote smart phone via a home gateway to turn off a pool pump or heater, saving a tremendous amount of energy.

Because lighting is ubiquitous, devices such as lamps are natural candidates to build a wireless mesh for the Internet of Things. California has traditionally been a place where technological innovations such as IoT first appear and begin to thrive. However, the proposed strict limits on standby power threaten to stifle the development of the IoT and the energy savings it can enable. We urge you to increase the allowance for standby power in the Specification to 0.5 W or perhaps more realistically, 1.0 watt.

Although non-integrated lamps and associated separate drivers are not in the scope of this docket item, they offer similar or greater energy savings. A system using a driver that can provide greater power, and/or a separate sensor, and/or a separate wireless transceiver should be allowed more standby power than the integrated, low-power lamps described in the present proposed specification.

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:

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Sincerely,

Roy Harvey
Manager, SSL Standards and Regulations

OSRAM, Inc
roy.harvey@osram.com
200 Ballardvale St
Wilmington MA 01887
978-570-3267