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| <b>Docket Number:</b>   | 17-AAER-15   |
| <b>Project Title:</b>   | Appliance Efficiency Standards Rulemaking for Computers and Light-Emitting Diode Lamps   |
| <b>TN #:</b>            | 221132   |
| <b>Document Title:</b>  | Email to Energy Commission from Jim Gaines. Philips Lighting. March 8, 2017 Regarding Title 20 Approbation                         |
| <b>Description:</b>     | Document relied upon. Email to Energy Commission from Jim Gaines. Philips Lighting. March 8, 2017. Regarding LED lifetime testing. |
| <b>Filer:</b>           | Patrick Saxton   |
| <b>Organization:</b>    | Philips Lighting/Jim Gaines  |
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From: Gaines, Jim [<mailto:jim.gaines@philips.com>]  
Sent: Wednesday, March 08, 2017 9:16 AM  
To: Pasha, Soheila@Energy  
Subject: RE: Title 20 approbation

Hi Soheila: It is true that manufacturers have enough time to complete testing by January 2018, for a product that is already designed and launched. But we design and launch dozens of LED Lamp products all year long.

For instance, consider a hypothetical product that is being designed right now, to take advantage of the latest improvements in LED performance, and other design improvements. It will be done and ready to launch in August 2017. We know the lifetime based on our internal testing and design procedures (say 25000 hours for this example). We launch the product in August 2017, and the life testing starts simultaneously on production samples. The life testing won't be completed with reports written, etc, until June, 2018.

As I understand it from your earlier responses, this product is in the awkward position that it may be listed in August 2017, with our estimated lifetime. Then it has to be removed from the database from Jan 2018 until June 2018, when the testing completes. Then we would have to file to get it back on the database again?

The DOE test procedures allow the use of estimated values to certify a product, while the testing is ongoing. Did California intentionally take the stricter approach of requiring completion of the life testing before the product can be certified and sold in California? This will cause substantial delay in the availability of the newest products in CA, with respect to the rest of the US.

I'm trying to make sure I understand the procedure. It will have bearing on whether/when we make new designs for California.

Sorry for all the questions. There is a lot of nuance here!

Jim