

## DOCKETED

<b>Docket Number:</b>	17-AAER-07
<b>Project Title:</b>	General Service Lamps
<b>TN #:</b>	221226
<b>Document Title:</b>	NRDC Comments on General Service Lamps September 18, 2017
<b>Description:</b>	N/A
<b>Filer:</b>	System
<b>Organization:</b>	Noah Horowitz
<b>Submitter Role:</b>	Public
<b>Submission Date:</b>	9/18/2017 4:53:57 PM
<b>Docketed Date:</b>	9/18/2017

*Comment Received From: Noah Horowitz*

*Submitted On: 9/18/2017*

*Docket Number: 17-AAER-07*

**NRDC Comments on General Service Lamps September 18, 2017**

*Additional submitted attachment is included below.*



## **NRDC Proposal on General Service Lamps (Expanded Scope)**

**Docket # 17-AAER-07**

September 18, 2017

On behalf of the Natural Resources Defense Council (NRDC) and its more than 400,000 members and electronic activists in California we respectfully submit our proposal to the California Energy Commission (CEC) for expanding the scope of its general service lamps (GSLs) regulations. NRDC has actively participated in the various legislative and regulatory proceedings at the national level and in California tied to GSL energy efficiency and brings a deep understanding of the lighting technologies, the GSL market, and test methods for measuring the light output and performance of various lighting products (incandescent, halogen, CFL and LED).

Today's submission supplements [NRDC's earlier comments](#) to the CEC on GSLs where we provided additional details and rationale for our proposal.

***1. We recommend CEC adopt the definitions for GSL lamps that were adopted by the Department of Energy and published on January 19, 2017.***

As we previously stated, NRDC fully supports the updated definitions for GSLs published by the DOE and respectfully requests the CEC update the scope/definitions of its Title 20 regulations for GSLs to align with the 1/19/2017 DOE definitions. These definitions close potential loopholes, which if exploited, could threaten some of the expected savings the GSL efficiency standards are intended to deliver. The 1/19/2017 definitions also remove several prior exemptions as they were no longer justified. As a result, previously exempted lamps such as 3-way, candelabra bases, reflector lamps, and lamps with various shaped enclosures are now included in the updated definition and will be subject to applicable energy efficiency standards for GSLs.

In the DOE's recent notice of data availability (NODA) and request for information (RFI) on general service incandescent lamps (GSILs), the agency includes a table of estimated annual national sales of various types of previously exempted GSILs. A few items to highlight from this data:

- A. Annual national sales of reflector lamps are estimated at 316 million on 2015. Given this large sales volume, the inefficiency of incumbent halogen and incandescent reflector lamps, and the existence of high performing, cost-effective, energy efficient alternatives, its critical for CEC's updated scope to include reflector

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lamps. (Note, CEC's current standards for reflector lamps only applies to directional lamps with a diameter less than or equal to 2.25 inches.)

- B. While the estimated sales of some of the previously exempted lamps may be low today, their sales can grow dramatically in the future once a new, more stringent set of regulations go into effect. This type of behavior has already been evidenced by the growth in annual sales of vibration service lamps which are exempted and have grown from less than a million sales in 2011, the year before the first tier of national GSL energy efficiency standards went into effect, to more than 7 million sales in 2017. These lamps have a few extra filament supports and look and behave just as the old incandescent bulbs did, and are even less efficient. One could easily anticipate similar exploitation of the loophole for shatter resistant lamps whereby a manufacturer could continue to sell an inefficient halogen lamp simply by applying an inexpensive rubber type of cover over the lamp. These are the types of loopholes that need to be prevented.

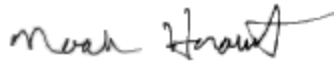
- 2. We recommend CEC lower the lumen output limits for its GSL standards to 150 lumens for GSLs with a candelabra base and 200 lumens for GSLs with all other base types.**

As we stated in our prior comments, the current lumen range in CEC's Title 20 regulations would fail to cover some of the 40 W incandescent and halogen replacement lamps on the market today and many of the 25 W replacements, in particular the candelabra based or flame shaped lamps that go into chandeliers and sconces. The change we recommend aligns the scope of CEC's efficiency standards for GSLs with its existing regulations for LED lamps.

- 3. The CEC should move forward with its plans to amend the scope of its GSL regulations and to do so in an expeditious manner.**

As we stated in our prior comments, California's attainment of the potential energy savings and emissions reductions from its 45 lumen per watt standard for GSLs in California is contingent upon having a sufficiently inclusive and loophole free scope and set of definitions. While the lighting industry is pursuing various methods, including litigation, to delay or derail the energy efficiency standards for GSLs in CA and at the national level, we urge the CEC to move forward with its proceeding and to update the scope of products covered by its standards as soon as possible. The existence of these legal challenges, which NRDC and others disagree with, does not warrant delay of the CEC proceeding.

Respectfully submitted,

A handwritten signature in black ink that reads "Noah Horowitz". The signature is written in a cursive style with a long horizontal stroke at the end.

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