

DOCKETED

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MaxLite Comments on 2019 Building Energy Efficiency Stds 45-Day Express Terms

Additional submitted attachment is included below.



Date: March 5, 2018

California Energy Commission
Commissioner Andrew McAllister
Docket No. 17-BTSD-02
Project Title: 2019 Title 24, Part 6, Building Energy Efficiency Standards Rulemaking
1516 Ninth Street
Sacramento, CA 95814-5512

RE: MaxLite Comments on 2019 Building Energy Efficiency Standards 45-Day EXPRESS TERMS

Thank you for allowing us to comment on the 45-Day express terms for the California Building Energy Efficiency Standards, Title 24, Part 6. We appreciate the Commission's hard work on these standards and willingness to consider industry feedback and proposals.

Summary of recommendations

Document Title	TN#	Section	Recommendation
45-day Express Terms 2019 Standards Ch 7	222176	Table 150.0-A Classification of High Efficacy Light Sources	Allow Safety Listed miniature SSL lamps with ANSI base types G4, GY6.35, and G9 to be automatically classified as high-efficacy light sources for T24.
45-day Express Terms 2019 Standards JA8	222216	JA 8.4.5 Lumen Maintenance, Rated Life and Survival Rate	Include language that makes it clear that SSL filament lamps that are 2200K and 2500K CCT can utilize same "early certification" life test methods as all other CCTs of LED lamps.
45-day Express Terms 2019 Standards JA8	222216	JA 8.5 Marking	Maintain JA8-2016 marking exemption for lamps and LED light engines with diameters less than 1.0" and decorative lamps with diameters less than 2.0"
45-day Express Terms 2019 Standards JA8	222216	JA 8.6 Data Reporting	Simplify and streamline the MAEDBS database prior to the new product type called "T20 LAMP"

45-Day Express Terms 2019 Standards Ch 7
Table 150.0-A Classification of High Efficacy Light Sources

Issue:

Industry has been unable to meet some of the specifications of JA8 such as flicker and dimmability in some popular residential miniature lamp types due to the physical size of these tiny lamps. (Many less than 1" dia x less than 2" L.)

Comments:

Since JA8-2016 was released in June 2015, light source manufacturers have made various attempts to achieve JA8 compliance with miniature LED lamps such as G9 base LED lamps. However, these products have been unable to meet JA8 specifications largely due to the electrical components needed to achieve flicker, PF, and dimmability metrics. As these miniature lamps are smaller in 1" diameter in many cases, there is a physical size limitation in being able to meet these metrics in these products.

These miniature lamps in LED are typically used in lieu of 25-50W halogen lamps in decorative residential luminaires such as pendants and bath bars. Since no JA8 lamps of these types have been able to be produced to-date, builders in California are unable to use any socketed luminaire designs that feature these bases for new residential construction.

It is recommended that the Commission allows SSL lamps with the following ANSI standard bases: G4, GY6.35, G9 base to be automatically classified as high efficacy.

Further conditions should also be included for these products that such lamps must be Safety Listed using language similar to the electrical safety requirements found in ENERGY STAR Lamps V2.1 sec. 11.1 below:

Lamp shall comply with ANSI/UL 1993-2012 and ANSI/UL 8750-2009 as applicable.

Recommendation:
Allow Safety Listed miniature SSL lamps with ANSI base types G4, GY6.35, and G9 base to be automatically classified as high-efficacy light sources for T24.

45-Day Express Terms 2019 Standards JA8

Section JA 8.3.5 – Lumen Maintenance and Rated Life Test

Issue:

Much of this section refers to ENERGY STAR LAMPS V2.1 for light source testing. However, ENERGY STAR LAMPS V2.1 has a restriction in Section 9.6 that excludes filament-style LED lamps with certain CCTs from achieving early interim certification for life testing (3,000 hours life test). While the JA8 document shows no specific exclusions for technologies or certain CCTs of LED lamps, language needs to be added to this document to make it explicitly clear that, unlike ES Lamps V2.1, no restrictions for filament-style LED lamps of any CCT exists that prevents early certification.

Comments:

In December 2015, when ENERGY STAR LAMPS V2.0 (which later was updated to V2.1) was written by EPA, they were concerned that these “vintage” filament lamp types and these two brand new CCT categories introduced in ANSI C78 were too new to the market to allow early certification. By 2020, when JA8-2019 is effective, there will be ample testing history to allow these lamps to utilize same life test metrics as any other SSL lamp type.

Recommendation:
Include language that makes it clear that SSL filament lamps that are 2200K and 2500K CCT can utilize same “early certification” life test methods as all other CCTs of LED lamps.

45-Day Express Terms 2019 Standards JA8

Section JA 8.5 Marking

Issue:

There is not enough physical space on small engines and lamps to include the “JA8-2019” text in letters large enough for it to be useful to an inspector. Additionally, it is problematic for manufactures to add such text to light sources that are already required to contain quite a few markings for Safety Certification, Marketing, and Replaceability.

Additionally, consumers have complained that markings on glass decorative lamps such as clear glass LED filament candle lamps detract from the aesthetics of the products.

Comments:

Note that it is in a manufacturer’s best interest to include JA8 markings on all products that have undergone JA8 testing and achieved JA8 compliance. Thus, we will certainly place the markings on all products where we can. However, some products are just too tiny to include any more markings that absolutely required for safety listings. A sample of markings/etchings that must already be placed on a LED candle lamp (which is less than 2” diameter):

- Brand name
- Model number
- Voltage
- Power
- Wattage
- Frequency
- Lumen output
- CCT
- Date code
- Open/closed luminaire diagram or phrase that describes application environment
- Safety Marking (including Safety file number and product type)

As an alternative solution, some sort of JA8 logo could also be employed for these products which would help to eliminate the 10 characters required for “JA8-2019-E.”

Recommendation:
Maintain JA8-2016 marking exemption for lamps and LED light engines with diameter less than 1.0” and decorative lamps with a diameter less than 2.0” or the Commission develop a logo for such products

45-Day Express Terms 2019 Standards JA8

Section JA 8.6 Data Reporting

Issue:

This proposal intends to add a new category of product called a “T20 LAMP.” The MAEDBS is already quite confusing for users seeking to find certified products. A new category called “T20 LAMP” is going to create additional confusion unless some effort is taken to streamline and simplify MAEDBS.

Comments:

Due to confusing category names and overlapping voluntary, state-regulated, appliance, and building codes all sharing the same database; consumers and industry stakeholders are finding it difficult to search and find desired products and know which database in which to search.

For example, if this new “T20 LAMP” category is added, and a user is seeking a properly certified omnidirectional lamp, it will be very difficult to know where in the database they should look to find such a product. A product that is a “LAMP” could potentially be contained within any one of the currently-existing MAEDBS databases below:

- 2013 JA8 High Efficacy LEDs
- 2016 JA8 High Efficacy Lighting
 - Omnidirectional Lamp
 - Directional Lamp
 - Decorative Lamp
- Lamps
 - 2-foot U-shaped general service fluorescent lamp
 - 4-foot medium bi-pin general service fluorescent lamp
 - 4-foot mini bi-pin high output general service fl. lamp
 - 4-foot mini bi-pin std output general service fl. lamp
 - 8-foot high output general service fluorescent lamp
 - 8-foot slim line general service fluorescent lamp
 - Candelabra incandescent lamp
 - General service incandescent lamp
 - Intermediate Base Incandescent lamp
 - Incandescent reflector lamp
 - LED lamps
 - Modified spectrum incandescent reflector lamp
 - Modified spectrum general service incandescent lamp
 - Other
- State-regulated Light Emitting Diode Lamp
 - E12 Candelabra Base
 - E17 Intermediate Base
 - E26 Medium Screw Base
 - GU-24
 - Retrofit Kit
- 2019 JA8 High Efficacy Lighting (proposed for T24 2019)



- Omnidirectional Lamp
- Directional Lamp
- Decorative Lamp
- T20 Lamp

If this "T20 LAMP" category is indeed added as a product category for JA8-2019, there should be some effort taken to considerably streamline and simplify the database and product category names in order to ease user searchability and reduce the chance for confusion.

Also, note that the California APPLIANCE program does not have a product designation in the regulations that is referred to as a "T20 LAMP," so the labeling/naming of such a category of product in JA8-2019 should perhaps be reconsidered.

Recommendation:
Simplify and streamline the MAEDBS database prior to the new product type called "T20 LAMP"

Thank you.

Regards,

Chris Primous

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