

DOCKETED

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Comment Received From: Emery Allen LLC

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On Maxlite Recommendations to CEC dated 03-05-18

Additional submitted attachment is included below.



Date: March 7, 2018

California Energy Commission
Commissioner Andrew McAllister
1516 Ninth Street
Sacramento, CA 95814-5512

Docket No. 17-BTSD-02
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Re: EmeryAllen comments on Maxlite recommendations to CEC dated March 5, 2018.

On Monday March 5th, 2015, MaxLite submitted a summary of recommendations to the CEC in reference to Title 24, Part 6 and more specifically JA8-2016 compliance.

Maxlite’s 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.

As stated by MaxLite:

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.

EmeryAllen Rebuttal:

The above statement is false. Although it has been extremely challenging to meet these requirements, EmeryAllen has developed a series of LED lamps that encompass multiple wattages, voltages and base configurations (120v -G9, G8, E11, E12, BA15D and 12v - G4 and GY6.35). Our products have been submitted to a third party NVLAP test lab. We have successfully passed the performance section of the test requirement and are in the middle of life testing. Based on the LM80 data provided to us from the chip manufacturer and our initial lumen depreciation results, we should have no problem in meeting the life testing requirement.

EmeryAllen Supports

EmeryAllen does highly agree and supports MaxLite’s recommendation to have these lamps Safety Listed:

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.

The safety of a lighting system is only as good as it’s weakest link. Every single component of a lighting system is required to be either a recognized component or listed component, except the bulb. In order to ensure the safety to electricians, repairpersons and homeowners all LED bulbs need to be Safety Listed.

EmeryAllen also supports the following MaxLite recommendations:

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”

Thank you for allowing EmeryAllen to submit our comments.

Sincerely,
 Tom Garber
 President
 EmeryAllen

