

DOCKETED

Docket Number:	18-AAER-10
Project Title:	Amendments to Title 20 Appliance Efficiency Regulations Rulemaking
TN #:	223440
Document Title:	Philips Lighting Comments on 45 Day Language
Description:	N/A
Filer:	System
Organization:	Philips Lighting
Submitter Role:	Public
Submission Date:	5/14/2018 3:46:21 PM
Docketed Date:	5/14/2018

Comment Received From: Philips Lighting

Submitted On: 5/14/2018

Docket Number: 18-AAER-10

Philips Lighting Comments - 45 Day Language 18-AAER-10

Additional submitted attachment is included below.



May 14, 2018

Submitted electronically

Ms. Angelica Romo-Ramos

California Energy Commission
1516 Ninth Street
Sacramento, California 95814

Docket No.: 18-AAER-10

RE: Comments on 45 Day Language - Amendments to Title 20 Appliance Efficiency Regulations Rulemaking

Dear Ms. Romo-Ramos:

Philips Lighting greatly appreciates the effort the Energy Commission put into this rulemaking. Our detailed comments follow.

Philips Lighting is a global leader in lighting products, systems and services. Our understanding of how lighting positively affects people coupled with our deep technological know-how enable us to deliver digital lighting innovations that unlock new business value, deliver rich user experiences and help to improve lives. Serving professional and consumer markets, we sell more energy efficient LED lighting than any other company. We lead the industry in connected lighting systems and services, leveraging the Internet of Things to take light beyond illumination and transform homes, buildings and urban spaces.

Sincerely,

Anthony W. Serres, LC
Manager, Technical Policy
Philips Lighting

c: (202) 412-6143

e: anthony.serres@philips.com





Comments on Title 20 – 45 Day Language

Docket No.: 18-AAER-10

Amendments to Title 20 Appliance Efficiency Regulations Rulemaking

May 14, 2018

Philips Lighting appreciates the opportunity afforded by the Energy Commission to submit written comments on the 45 Day language for amendments to the Title 20 Appliance Efficiency Regulations. Our comments are generally listed in the order they appear in the document.

Section 1604(w)

We are concerned that the CEC is introducing a new class of products, i.e., non-federally regulated UPSs. This term does not appear to be defined. It is concerning as the proposed DOE regulation was to limit the scope to those UPS that have a NEMA 15A cord and plug. Would a non-federally regulated UPS be everything that does not have a NEMA 15A cord and plug? This change needs further discussion and clarification.

Section 1605.1 – Table K-4

The language in this table has been changed to follow what is in the DOE GSL draft rulemaking (81FR14528). We appreciate that the CEC is trying to harmonize with the DOE, however, the GSL rulemaking has not been finalized, and it may have substantive changes, thus it seems premature to change the language in T20 now.

Section 1607(d)(13) - Exception

We strongly support the inclusion of this exemption for incandescent wattage equivalency claims.

END COMMENTS