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IKEA Comments for the Proposed Amendments to the Appliance Energy Efficiency Regulations

Additional submitted attachment is included below.



2018-05-14

SUBMITTED ELECTRONICALLY
 California Energy Commission
 Docket No. 2018-AAER-10
 1516 9th Street, MS-4
 Sacramento, CA 95814

**Re: IKEA Comments for Proposed Amendments to the Appliance
 Energy Efficiency Regulations, California Code of Regulations,
 Title 20, Sections 1601 through 1609**

Docket No.: 2018-AAER-10

IKEA of Sweden, Range & Supply ("IKEA Range & Supply") appreciates the opportunity to comment on the California Energy Commission's ("CEC" or the "Commission") proposed amendments to the Appliance Efficiency Regulations, California Code of Regulations, title 20, sections 1601 to 1609.

IKEA Range & Supply is responsible for designing and supplying the global IKEA range. The IKEA business is operated through a franchise system with over 400 stores in 49 markets. That means many companies with different owners work under the IKEA trademark. All work towards the shared IKEA vision — to create a better everyday life for the many people — which guides every decision. This includes caring for people and the planet. Making more from less and finding new, creative ways to deal with limited resources are part of the IKEA way of working. Today, this is more important than ever as the world faces huge challenges such as climate change, increasing inequality and unsustainable consumption.

We offer over 500 affordable product solutions for water efficiency, energy efficiency, renewable energy, and waste sorting. In 2015, we switched our entire lighting range to LEDs to make energy efficient lighting affordable for the many people. Last year, we introduced the RYET LED bulb in most markets at a price of around one U.S. dollar. By only offering LED lighting in the IKEA product range, in FY17 IKEA customers were able to reduce their energy consumption around the globe by 3.3 billion kWh. This is all to say, we support and share California's commitment to energy efficiency and the objective to reduce statewide energy consumption.

To further expand access to affordable, low-energy LED lights, IKEA Range & Supply proposes an update to the Title 20 requirements for portable LED luminaires. This update reflects current regulations and changes in the marketplace for energy-efficient lighting. Specifically, Table N-2 in section 1605.3(n), which remains unchanged since it was originally adopted in 2008, contains a requirement that portable luminaires with integrated LEDs have a light output of at least 200 lumens. IKEA proposes that the regulations be updated to remove this requirement, as follows:

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Table N-2

Minimum Requires for Portable LED Luminaries, and Portable Luminaries with LED Light Engines with Integral Heat Sink

Criteria	Requirement
Light Output	≥ 200 lumens (initial)
Minimum LED Luminaire Efficacy	29 lumens/W
Minimum LED Light Engine Efficacy	40 lumens/W
Color Correlated Temperature (CCT)	2700 K through 5000 K
Minimum Color Rendering Index (CRI)	75
Power Factor (for luminaires labeled or sold for Residential use)	≥ 0.70

The light output requirement for portable LED luminaires made sense when it was written into the regulations in 2008, as LED lighting was then a new technology unfamiliar to most consumers. At the time, there were only a few LED lighting products on the market. LED technology was in its early stages and had a hard time producing significant levels of light. In addition, regulators and the lighting industry had little experience with consumer expectations for LED lighting or feedback from consumers regarding LED lighting products.

In the ten years since the regulation was adopted, however, the LED industry and its underlying technology have undergone major improvements and become more mature. This extends to quality, production, testing and commercial applications. In addition, consumers have become more familiar, comfortable and reliant on LED lighting over the past decade. The 200 lumen requirement is no longer necessary. Further, the requirement prevents California consumers from having access to efficient, low-energy LED lighting options. IKEA Range & Supply offers a series of table and floor luminaires with built-in LED light sources that are highly energy efficient and use very little total energy — approximately 1.65 watts. The luminaires have a flexible neck allowing the user to easily direct light to just where the user wants for studying, reading, or working without illuminating an entire room. A product description for one of these luminaires, the JANSJÖ LED work lamp, is attached. Our affordable, low-power LED luminaires have received top ratings from customers who have purchased the over 1.5 million work lamps sold globally, outside of California. However, due to its light output rating of approximately 88 lumens, the JANSJÖ series currently cannot be offered for sale in California because of section 1605.3(n)'s minimum lumen requirement.

This amendment would be consistent with California policy and the Commission's objectives to reduce statewide energy consumption. Removing the requirement would allow low-power LED luminaires, like those in IKEA's JANSJÖ series, to be sold in California. A search of the Department of Energy's LED Lighting

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Facts database, available at www.lightingfacts.com, reveals that, even among LED portable luminaires, which are generally one of the most efficient options, the average power consumption is approximately 13 watts. Allowing the sale of low-consuming LED luminaires in California, like the JANSJÖ series that use only 1.65 watts of power, will necessarily result in lower energy consumption with each luminaire sold. And, removing the 200 lumen minimum requirement, would not entail a change to any underlying appliance energy efficiency standards, which would remain the same under this proposal.

IKEA Range & Supply is excited to collaborate with the California Energy Commission on its valuable work creating standards for energy efficient and sustainable products. Please just let us know if we may provide any additional information or clarification, as we are happy to answer any questions or provide further information.

Sincerely,

Kelly Swaine

A handwritten signature in black ink that reads "Kelly Swaine".

Director of Regulatory Affairs
IKEA of Sweden, Range & Supply

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Article Number: 003.859.41

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Size 24 "

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Models: LED work lamp

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Assembly



Product information

Materials and environment

Assembly & documents

Package details

Ratings

- You can easily direct the light where you want it because the lamp arm and head are adjustable.
- The LED light source consumes up to 85% less energy and lasts 20 times longer than incandescent bulbs.

Good to know

LED life approx. 20,000 hours.
Light color; warm white (3000 Kelvin).
Built-in LED light source.
May be completed with other lamps in the same series.

Care instructions

Wipe clean with a damp cloth.
Wipe dry with a clean cloth.

Product dimensions

Luminous flux: 88 Lumen
Height: 24 "
Base diameter: 5 "
Cord length: 6' 7 "
Power: 2.0 W

Luminous flux: 88 Lumen
Height: 60 cm
Base diameter: 12 cm
Cord length: 2.0 m
Power: 2.0 W

This product requires assembly

Designer:
A Efverlund/J Jelinek

More JANSJÖ series



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