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Additional submitted attachment is included below.



September 17, 2018

Online via:

Commissioner Andrew McAllister
Mr. Patrick Saxton
California Energy Commission
Docket Unit, MS-4
Re: Docket No. 17-AAER-07
1516 Ninth Street
Sacramento, CA 95814-5512

**LEDVANCE Comments on CEC Staff Report Analysis of General Service Lamps
(Expanded Scope) 17-AAER-07**

Dear Commissioner McAllister and Mr. Saxton:

LEDVANCE LLC provides the attached comments in response to CEC's Request for Comments on the Draft Staff Report Analysis of General Service Lamps (Expanded Scope).

With offices in more than 50 countries and business activities in more than 140 countries, LEDVANCE is one of the world's leading general lighting providers for professional users and end consumers. In North America, LEDVANCE LLC offers a wide range of SYLVANIA LED luminaires for various applications, intelligent lighting products for Smart Homes and Buildings, one of the largest LED lamps portfolios in the industry, and traditional light sources. The SYLVANIA brand leadership is a result of over 100 years of lighting experience and paves the way for future success.

Thank you for your consideration, and if you have any further questions, please don't hesitate to contact me.

A handwritten signature in black ink that reads "Jennifer R. Dolin".

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These comments pertain to the CEC Draft Staff Report titled Analysis of General Service Lamps (Expanded Scope) in Docket Number 17-AAER-07.

CEC Efficiency Standards are Premature

The California Energy Commission staff report and recommendations are premature. DOE has not completed its rulemaking, and its actions could significantly affect the options available to the CEC to implement additional lighting standards. We recommend that the CEC wait until DOE has finalized its GSL rulemaking, as it is required to do.

In 2007, Congress directed the DOE through the Energy Independence and Security Act (EISA) to enact energy efficiency standards to reduce energy consumption in the United States from the most common lighting products – the general service incandescent lamp, and the incandescent reflector lamp. These standards were enacted, and by 2014 the standard incandescent lamp had been phased out.

EISA also directed DOE to assess the status of lighting in 2017 to determine whether more could be done to help consumers save energy. DOE has yet to make that determination. NEMA provided data in response to the NOPA this year that shows a declining market for “traditional” light sources, and a rise in LED sales. This means that the market is transforming towards a higher lpw than the 45 lpw that EISA set as a last resort, to be enacted if the market wasn’t achieving savings on its own. This shows that further regulations are not needed to achieve the results Congress wanted.

Expanded Scope

With the January 2017 definitions rule, DOE overstepped its bounds – general service lamps have never included decorative or specialty lighting. The point of EISA is to achieve energy savings from high-usage lamps. This has been accomplished, and the market alone is taking that several steps farther. It is possible that DOE could reverse its determination, meaning that these lamps would remain “covered products” that cannot be further regulated by the CEC.

As the recent energy-efficiency standards enacted in California for small diameter directional lamps show, enacting legislation for products without widespread availability of compliant models results in higher costs for consumers and fewer available options.

Furthermore, including the reference to “an ANSI base” in the definition of general service lamp brings in over 100 lamp base variations to the scope of lamps that would potentially be regulated as a general service lamp. We assume the CEC meant to only include standard bases used in residential applications, and we encourage the CEC to be more specific. Furthermore, it seems that CEC staff undertook no economic, energy-savings or feasibility analysis before expanding the scope to high lumen lamps, and lamps outside the 110-130 volt range. Again, none of these are general service

lamps. This section should be stricken, or a full analysis be completed and the section revised.

We urge the CEC to consider realistic product feasibility rather than wishful suggestions from representatives who have never worked in manufacturing or the private sector.

Inaccurate energy savings calculations

Furthermore, the CEC Draft Staff report significantly overestimates the energy savings achievable from decorative, specialty, low-lumen and high-lumen lamp types. These are not “general service” lamps, and by definition are not used for general service applications. See NEMA comments and supporting data submitted separately.

Sold vs. manufactured

Lastly, the CEC Staff’s Draft Report proposes applying the standards to general service lamps “sold on or after Jan 1, 2020.” We implore the CEC to change the word “sold” to “*manufactured*.” Throughout the extremely complex and balanced supply chain – from manufacturing and importing down to consumer purchasing – a manufacturer date is far cleaner to implement and enforce than a sell-by date. It also provides retailers set parameters and guidelines to meet consumer demands – decisions regarding what to offer on retail shelves are made 6-12 months in advance. A “sell-by” date would result in uncertainty about market demand and concern over having leftover, unsellable inventory. Every action following (removal from shelves, returns, redistribution) means added costs that are passed on to consumers.

With the thousands of retail locations, and the proposed expanded definition of general service lamps, the Commission does not have the resources to enforce sales compliance. Just as decisions are made 6-12 months in advance, sales to retailers are also made well in advance. Manufacturers should not be liable for sales made in 2019 that can no longer be sold months later -- manufacturers have no control over products already shipped into the California market.

Thank you again for your consideration.