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Draft Staff Report Analysis of General Service Lamps (Expanded Scope)
Docket Number 17-AAER-07

Additional submitted attachment is included below.



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

**RE: Draft Staff Report Analysis of General Service Lamps (Expanded Scope)
Docket Number 17-AAER-07**

Dear Commissioner McAllister:

Whirlpool Corporation thanks the Commission for the opportunity to provide comments on the *Appliance Efficiency Pre-rulemaking for General Service Lamps (Expanded Scope)* (Docket 17-AAER-07). For the reasons set forth below, Whirlpool believes that appliance bulbs should not be included in the definition of general service lamp (GSL) because appliance bulbs have atypical environmental conditions that warrant different treatment.

Whirlpool Corporation is the world's leading major home appliance company, with 92,000 employees and 70 manufacturing and technology centers around the world. We have several California facilities, including the Yummly headquarters in Redwood City and two regional distribution centers in Stockton and Perris.

First, the current Energy Commission GSL regulations should not include appliance bulbs because the regulations do not properly account for high temperature applications and do not adequately address the sale of products such as appliances that incorporate lighting. While LED bulbs have been designed to replicate many of the shapes of incandescent bulbs, the internal circuitry of the bulb is not always adequate for the environment in which it is to be installed. This is particularly true for high temperature environments which reduce bulb life expectancy dramatically. When the replacement of the lamp at a higher frequency is considered, the energy savings and consumer benefits are greatly reduced. Whirlpool Corporation proposes that the Energy Commission specifically exempt lamps in appliances from the GSL regulation, allowing manufacturers to provide illumination that is adequate for the task and provides value to the consumer over the life of the product.

Second, exclusion of appliance lamps is also necessary because the proposed requirements include a provision that bulbs be identified by a date code at the point of sale. For appliances, most end product bulbs are shipped installed in the appliance, eliminating the option for the date code to be printed on the carton of the bulb. Nor it is possible to remove the bulb from the product to view the date code printed on the bulb.¹

Finally, the Modernized Appliance Energy Database System (MAEDBS) for appliance certification does not support the inclusion of appliance lighting under GSL regulations. There are insufficient categories

¹ In the alternative, if appliance lamps are covered under GSL regulations, we propose the addition of language to exempt bulbs that are provided as a component of another product.



under the lighting section to include appliances and the lighting considerations. Further, some appliances include lighting that is not covered by the Title 20 requirements and a means to accommodate those products will need to be determined. Moreover, the current lighting requirements require test reports that are owned by the bulb supplier and which may be difficult to obtain as a third party. The GSL regulations should not cover appliance lamps, but if they do, MAEDBS must support the inclusion and manufacturers must have sufficient time to enter model information before the regulation effective date.

Whirlpool Corporation appreciates the Commission's consideration of these comments. Please contact me at stephen_e_gatz@whirlpool.com if you have any questions or if you need additional information.

Sincerely,

Stephen E Gatz
Lead Engineer, Codes Safety and Regulatory