

DOCKETED

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*Comment Received From: California Retailers Association
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CRA Comments

Additional submitted attachment is included below.



October 7, 2019

Commissioner Andrew McCallister
California Energy Commission
Dockets Office
1516 Ninth Street, MS-4
Sacramento, CA 95814-5512

Re: Comments on Docket # 19-AAER-04

Dear Commissioner McCallister:

The California Retailers Association (CRA) appreciates the opportunity to submit comments regarding General Service Lamps (19-AAER-04).

CRA is the only statewide trade association representing all segments of the retail industry including general merchandise, department stores, mass merchandisers, fast food restaurants, convenience stores, supermarkets and grocery stores, chain drug, and specialty retail such as auto, vision, jewelry, hardware, and home stores. CRA works on behalf of California's retail industry, which currently operates over 164,200 stores with sales in excess of \$571 billion annually and employing over three million Californians – nearly one-fifth of California's total employment.

CRA requests that the Energy Commission eliminate the decade-old Title 20 requirements for portable luminaires, as they are outdated and no longer cost-effective in today's marketplace.

Title 20 currently requires portable luminaires to be sold with an energy efficient CFL or LED lightbulb attached. Adopted in 2010, this regulation was intended to encourage consumer purchases of more energy efficient light bulbs. However, current rules mostly prohibit the sale of light bulbs other than high efficiency bulbs, and as such there is no longer a policy benefit that justifies the significant additional cost to consumers and retailers for these lamps.

The mandate to pre-install bulbs in portable lamps is costly both for consumers and our waste stream. For the purchase of an ordinary portable luminaire, each light bulb that must be attached pre-sale adds

roughly \$5 extra to the retail price of a luminaire, or multiples of \$5 for lamps requiring multiple bulbs. This can be a significantly higher cost than self-purchase. Worse, these costs may finance bulbs that are not to the consumer's liking and will be thrown away early in their useful life. Indeed, the market for light bulbs has exploded in recent years with consumers preferring different color temperatures, brightness, and digital controls. The presence of a mandatory bulb with each lamp drives not only additional cost but waste on both the consumer and retail sides of the equation, as consumers throw away unwanted bulbs and retailers attempt to match inventories across multiple supply chains.

The added requirement in Title 20 that bulbs match the functionality of the luminaire socket can also mean fewer options for California consumers in terms of available lamps. Oftentimes, more sophisticated options such as dimmable or three-way lamps are not offered to California consumers because of the considerable expense in providing the appropriate bulb, which can be several times as expensive as a standard bulb. This situation confuses consumers who cannot understand why they cannot purchase a lamp they viewed online. It is also a perpetual complication for retailers who must manage multiple inventory sets for California customers, and California-only store designs, to accommodate these requirements.

The need to include a light bulb with every lamp is obsolete if California consumers have no other choice but to purchase highly efficient light bulbs from their local stores. We respectfully request that the CEC remove Title 20 requirements regarding portable luminaires.

Sincerely,

A handwritten signature in cursive script that reads "Steve McCarthy".

Steve McCarthy
Vice President, Public Policy and Regulatory Affairs
California Retailers Association