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<b>Organization:</b>	Anthony Serres
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*Comment Received From: Anthony Serres  
Submitted On: 3/9/2021  
Docket Number: 19-BSTD-03*

## **Signify Comments on 2022 Express Terms**

*Additional submitted attachment is included below.*



March 9, 2021

Submitted via e-mail

Mr. Peter Strait  
California Energy Commission  
1516 9th Street, MS-4  
Sacramento, CA 95814

**Signify comments on the Draft 2022 Energy Code Express Terms**

**Docket Number: 19-BSTD-03**

Dear Mr Strait:

Signify (formerly Philips Lighting) appreciates the opportunity to comment on the draft 2022 Express Terms.

Signify 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.

Please contact me if you have any questions.

Sincerely,

A handwritten signature in black ink that reads 'Anthony Serres'.

Anthony W. Serres, LC  
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## Comments

### 2022 Energy Code Express Terms

March 9, 2021

Signify welcomes the opportunity to comment on the draft Express Terms. Detailed comments on specific topics follow.

#### **Section 100.1 – Definitions and Rules of Construction**

We recommend replacing the existing definition of LED Driver with the following from UL 8750: “A power source that adjusts the voltage or current to LEDs, ranging in complexity from a resistor to a constant voltage or constant current power supply. Also referred to as Lamp Control Gear.”

#### **Section 110.9(b)(5) -Mandatory Requirements for Lighting Contols**

We support the removal of the “part night” outdoor lighting controls and believe this change will provide clarity to the outdoor lighting control requirements while maintaining energy efficiency.

#### **Section 110.12 (c) – Mandatory Requirements for Demand Management**

(c) **Demand Responsive Lighting Controls.** Nonresidential lighting systems subject to the requirements of Section 130.1(b) with a general lighting power of 4,000 watts or greater, shall have controls that ~~are~~ Lighting controls in nonresidential buildings larger than 10,000 square feet shall be capable of automatically reducing lighting power in response to a Demand Response Signal. General lighting shall be reduced in a manner consistent with the uniform level of illumination requirements in TABLE 130.1-A.

We believe that the intent of this language change was to put the ADR controls requirement on any building that also required multi-level controls and had a total connected lighting load of 4,000 watts or more. This is not what the proposed language indicates when it says "nonresidential lighting systems...with a general lighting power of 4,000 W or more", so in keeping with what we surmise to be the desired intent, we propose the language be modified as follows:

**Demand Responsive Lighting Controls.** Demand responsive lighting controls shall be required in buildings ~~Nonresidential lighting systems subject to the requirements of Section 130.1(b) and with a general lighting power total connected lighting load of 4,000 watts or greater shall have controls that are.~~ Lighting controls in nonresidential buildings larger than 10,000 square feet

shall be capable of automatically reducing lighting power in response to a Demand Response Signal. General lighting shall be reduced in a manner consistent with the uniform level of illumination requirements in TABLE 130.1-A.

**Section 120.6 (h)(2)(C) and 120.6(h)(6) – Mandatory Requirements for Covered Processes**

While we understand setting the photosynthetic photon efficiency values at 1.7 $\mu$ mol/J and 1.9 $\mu$ mol/J respectively and we support the requirement for scheduled controls for horticulture lighting, we strongly question the need for multi-level (dimming) control requirements because this section is lighting for horticulture (not people) and all of the lighting will be on a scheduled control.

**Section 120.6 (h)(3) - Mandatory Requirements for Covered Processes**

We support requirements for the capability to provide monitoring of electrical energy usage for horticulture lighting loads.

END COMMENTS