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*Comment Received From: Anthony Serres
Submitted On: 8/9/2021
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Signify 15 Day language comments

Additional submitted attachment is included below.



August 9, 2021

Submitted via e-mail

Dr. Andrew McAllister
California Energy Commission
1516 9th Street, MS-4
Sacramento, CA 95814

Signify comments on the Draft 2022 Energy Code 15 Day language

Docket Number: 21-BSTD-01

Dear Dr. McAllister:

Signify (formerly Philips Lighting) appreciates the opportunity to comment on the 15-day language for the draft 2022 Energy Code.

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 15-day language

August 9, 2021

Signify welcomes the opportunity to comment on the 15-day language.

We are disappointed to see the removal of the simplifying option to accept Title 20 products as high luminous efficacy light sources from the 15-day language. We strongly encourage its reinstatement. In their comments, both NEMA and Signify specifically supported the simplification proposed in the 45-day language.

Other comments to the 45-day language expressed concern about negative effects of Title 20 lamps replacing Title 24/JA8 lamps, primarily related to temporal light artifacts. However, any negative ramifications of simplifying Title 24 as proposed in the 45-day language are nonexistent. The strongest argument for this (and for reinstating the 45-day simplification) is that the sales of Title 20 compliant lamps, which are far higher than the sales of Title 24/JA-8 compliant lamps have *not* led to a deluge of consumer complaints, or other reports of compromised safety and harmful exposure to poor quality lighting in California. It would appear that the CEC is simply taking the path of least resistance, making no decision for improvement and simplification. This perpetuates the burden for the building industry, building inspectors, manufacturers, and ultimately for the consumer.

The burden imposed by the combination of Title 20 and Title 24 is that manufacturers must maintain two lower-volume product portfolios designed for two different specifications, perform more testing, and perform more certification. The associated higher costs, for no perceptible benefit, will only increase prices for the consumer.

END COMMENTS