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American Lighting Association Comments

Additional submitted attachment is included below.



January 8, 2024

VIA: CEC's electronic commenting system

Ms. Corrine Fishman
Regulations Manager, Efficiency Division
California Energy Commission
Docket Unit
Docket No. 22-AAER-04
715 P Street, MS-4
Sacramento, CA 95814

RE: Notice of Proposed Action: Federal and Administrative Updates, Appliance Efficiency Regulations, Title 20, Article 4, Sections 1601 – 1609, California Code of Regulations; (22-AAER-04)

Dear Mr. Fishman:

The American Lighting Association (ALA) represents nearly 550 member companies in the residential lighting, ceiling fan and controls industries in the United States, Canada, the Caribbean and Mexico. Member companies are manufacturers, manufacturers' representatives, retail showrooms and lighting designers.

These comments are submitted on behalf of ALA's members, regarding the California Energy Commission's (the Commission) proposed Federal and Administrative Updates to California's Appliance Efficiency Standards in Title 20, Section 1601-1609.¹ They are directly focused on the proposal's language concerning ceiling fans.

Harmonization

ALA's twenty-three ceiling fan manufacturing members design, engineer, test, source, market and sell the majority of small-diameter residential ceiling fans. These manufacturers are committed to exceeding consumer expectations with regards to style, design, utility and efficiency. As it relates to efficiency, ALA's members are dedicated to preserving and expanding access to ceiling fans for families with middle and fixed incomes, especially in California.

The ability to be successful in those efforts is determined by the number of regulatory burdens that industry must deal with. By harmonizing the definitions, test procedures, efficiency standards and certification requirements with those already finalized by the U.S. Department of Energy, the

¹ <https://www.energy.ca.gov/proceeding/federal-and-administrative-updates-title-20-appliance-efficiency-regulations>

Commission has effectively ensured the opportunity for manufacturers to be successful in meeting the needs of consumers.

ALA commends the Commission for not increasing the regulatory burdens on ceiling fan manufacturers and for recognizing the federal preemption for ceiling fans.

Affiliated Comments²

ALA agrees with and supports the comments submitted by AMCA regarding commercial and industrial fans and blowers. Furthermore, ALA supports the comments NEMA submitted regarding a multitude of topics from the proposal.

ALA urges the Commission to review these comment documents carefully and to address the concerns raised by both organizations.

Conclusion

ALA appreciates the opportunity to submit these comments and looks forward to continued engagement with the Commission as it considers amending the appliance efficiency regulations in Title 20.

Respectfully Submitted,

Michael Weems

Michael Weems
Vice President, Public Policy

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² <https://efiling.energy.ca.gov/Lists/DocketLog.aspx?docketnumber=22-AAER-04>