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*Comment Received From: National Electrical Manufacturers Association
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NEMA Comments re 2025 Title 24 15-Day Language

Additional submitted attachment is included below.



National Electrical Manufacturers Association

The association of electrical equipment
and medical imaging manufacturers
www.nema.org

June 28, 2024

Dr. Andrew McAllister, Commissioner
California Energy Commission
Docket Unit; Docket No. 24-BSTD-01
715 P Street, MS-4
Sacramento, CA 95814

Submitted Electronically To: Docket 24-BSTD-01 at
<https://efiling.energy.ca.gov/Ecomment/Ecomment.aspx?docketnumber=24-BSTD-01>

Re: NEMA Comments on 2025 Building Energy Efficiency Standards 15-Day Language

Dear Commissioner McAllister:

The National Electrical Manufacturers Association (NEMA) represents nearly 325 electrical equipment and medical imaging manufacturers that make safe, reliable, and efficient products and systems serving the building systems, building infrastructure, lighting systems, industrial products and systems, utility products and systems, transportation systems, and medical imaging markets. Our combined industries account for 370,000 American jobs in more than 6,100 facilities covering every state. These industries produce \$124 billion in shipments and \$42 billion in exports of electrical equipment and medical imaging technologies per year.

Members of NEMA's Lighting Systems Division have reviewed the 15-day language and identified the Commission's proposed changes to **JA8.5 Marking** and **JA8.9.1 Methods of Measurement and Reference Documents**. With our thanks for your attention to these matters, we would like to clarify that ANSI/IES LM-79 is not an elevated temperature life test. A far more appropriate method of measurement – which normatively references LM-79 for electrical and photometric testing – is ANSI/IES LM-84, with the additional requirement of separate testing at 45°C. This proposal would also align CEC regulations with the Department of Energy's energy conservation standards for general service lamps.

We believe this request is reasonable and aligned with everyone's best interests. If CEC does not agree with this proposed correction, we request a meeting immediately to understand the Commission's concerns and work towards an equitable solution.

Thank you again for your attention to these concerns. As always, you can reach me at alex.baker@nema.org.

Regards,

A handwritten signature in black ink, appearing to read 'Alex Baker', written in a cursive style.

Alex Baker
Director, Regulatory & Industry Affairs