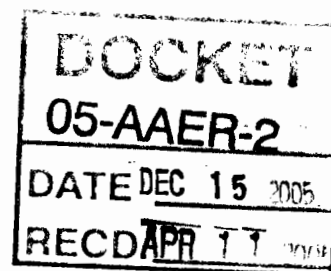




KYLE PITSOR

December 15, 2005

Tim Tutt  
John Wilson  
Gary Flamm  
California Energy Commission  
1516 Ninth Street  
Sacramento, CA 95815



**RE: Enhanced Spectrum Definition**

Dear Tim, John, and Gary:

During the October 26, 2005 workshop on the proposed Title 20 regulations for General Service Incandescent lamps, the NEMA Lamp Product Group ("NEMA") agreed to evaluate the definition of "Enhanced Spectrum" lamp currently within the Title 20 regulations. This agreement was the outcome of a discussion on potentially regulating "Enhanced Spectrum" lamps, also referred to as "modified spectrum" lamps. It was agreed that this is currently a niche product, but there was some concern raised about its potential to grow into a major lamp category. NEMA believes that substantial growth of this niche category is very unlikely given that this product has been available for a number of years with limited growth, is much higher priced than standard product, and has an unusual color appearance that does not appeal to all users. Like high-priced cars, this high-priced lamp product is available and marketed, but produces relatively limited sales. However, the Commissioners suggested that a tighter definition would prevent any manufacturer, including smaller importers, from exploiting this exempted class of products.

Based on the workshop, NEMA believes that there was no agreement or indication by the commissioners to regulate this niche product category while sales remained low. The only discussion was whether or not a tighter definition would be sufficient to prevent exploiting this category, or, whether or not regulatory standards, allowing only lamps currently available on the market, would need to be set to limit this category. There was general agreement to move forward with a tighter definition.

National Electrical  
Manufacturers Association

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It was noted that the efficiency levels proposed by the utility consultants were so severe that they would essentially eliminate 100% of this niche product category with no meaningful justification. Under any conditions, a regulation based on “**what-might-occur**” in the market cannot be justified. A meaningful justification would only be possible if this niche product category “**actually did**” grow into a major product category. NEMA believes this is very unlikely and is providing the following detailed technical definition to assure that any products offered in this category are truly “Enhanced Spectrum” or “Modified Spectrum” lamps.

Note that some NEMA members continue to evaluate this very recently created definition. Depending on the outcomes of these reviews, NEMA may offer slight modifications to the definition during the 45-day comment period if necessary.

**THE FOLLOWING PROPOSED DEFINITION FOR ENHANCED SPECTRUM LAMPS IS INTENDED TO COMPLETELY REPLACE THE EXISTING DEFINITION IN THE TITLE 20 REGULATIONS**

**ENHANCED SPECTRUM LAMPS**

“Enhanced Spectrum” or “Modified Spectrum” lamp, as related to incandescent lamps, means an incandescent lamp that is not a colored incandescent lamp, and, when operated at its rated voltage and wattage:

- o Has a color point ((x,y) chromaticity coordinates on the C.I.E 1931 chromaticity diagram) that lies below the black-body locus, and
- o Has a color point ((x,y) chromaticity coordinates on the C.I.E. 1931 chromaticity diagram) that lies at least 4 MacAdam steps distant from the color point of a clear lamp with the same filament and bulb shape, operated at the same rated voltage and wattage. The MacAdam steps are defined as referenced per IESNA LM16.

The designation shall be on the lamp packaging and market the lamp as having an “enhanced spectrum,” “modified spectrum,” or similar designation.

Very truly yours,



Kyle Pitsor  
Vice President, Government Relations