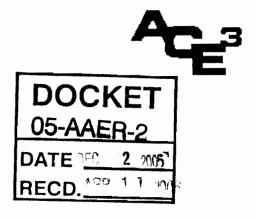


December 2, 2005

Commissioner Jackalyne Pfannenstiel Commissioner Art Rosenfeld California Energy Commission 1516 Ninth Street Sacramento, CA 95814



RE: Potential Appliance Efficiency Regulations for General Service, Reflector, and Enhanced Spectrum Incandescent Lamps; and for Metal Halide Luminaires

Dear Commissioners Pfannenstiel and Rosenfeld:

We are jointly writing as a follow-up to the CEC Workshop of October 26, 2005 on the referenced matter regarding incandescent reflector lamps.

Our two organizations submitted a joint proposal dated October 20, 2005 regarding potential CEC standards for incandescent reflector lamps that was discussed at the workshop. In our letter, and during the workshop, we noted efforts by several states to enact requirements for incandescent reflector lamps, and that our two organizations were discussing options to address the subject.

The purpose of this letter is to formally communicate to you that NEMA and ACEEE have agreed to work together to establish national energy efficiency standards for incandescent reflector lamps based on our joint compromise proposal of October 20, 2005. We agree to pursue this matter through both Congressional legislative and DOE regulatory fronts. In addition, we will continue to work with states based on our proposal.

We urge the Commission to favorably consider our compromise proposal as the basis for CEC efficiency regulations for incandescent reflector lamps.

Very truly yours,

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NEMA Rationales for Proposed Incandescent Reflector Lamp Regulations Based on the NEMA-ACEEE Proposal Submitted October 20, 2005 to the CEC

Lamp Type	Change	Rationale
BPAR	Add BPAR (blown PAR) lamps with	It is unclear from the current definition
	a diameter of 2.25 inches or more	whether these types are covered or
	to the definition of "Incandescent	not. Including them in the definition
	Reflector Lamp"	removes ambiguity.
BR30	Exempt 65W and ≤50W	65W BR30 lamps are affordable
		directional lamps used primarily in
		residential applications. They have
}		replaced the old style 75W R30 lamps
		as a result of federal regulations
		prohibiting BR30 lamp wattage from
		exceeding 65W. If we regulate them,
		manufacturers can still produce 65 W
		products that just meet the standards.
		This would increase lamp costs but not
		save any energy. For similar light
		output, the other options for replacing 65W BR lamps include: much more
		expensive compact fluorescent lamps
		that cannot be dimmed; higher
		wattage inexpensive general service
		incandescent lamps with no
		directionality; or more expensive
		halogen PAR lamps with significantly
		narrower beam spreads that illuminate
		less surface area in the home. When
		these options are considered, study
		and experience show that consumers
		would choose inexpensive higher
		wattage general service lamps often
		enough that in the best case, no
		energy will be saved, or in the worst
		case, more energy will be used.
		Additionally exempting 50W BR30
		lamps allows this low wattage version
		to remain as an energy-saving
BD 40	5 (5)4/ 1 5000	alternative to higher wattages.
BR40	Exempt 65W and <50W	The most popular BR40 lamps sold
		today are 120W, 100W and 75W and
		are used primarily in commercial
		applications. With the regulation, we
		expect the majority of consumers to purchase halogen lamps using from
		60-100W. By allowing a 65W version,
		as well as versions of 50W or less,
		commercial users will also have access
		to affordable energy-saving directional
		lamps of a size that fits into their
		existing light fixtures but use
		substantially less energy.

ER40	Exempt 65W and ≤50W	ER40 lamps are very low volume types—primarily 120Wused primarily in commercial applications in deeply recessed downlights, where the lamp's optical design helps decrease the amount of light trapped in the fixture. By allowing a 65W version, as well as 50W or less, commercial users will have access to affordable energy-saving directional lamps that fit into their existing installations but use substantially less energy and provide the unique light distribution for the application
ER30	Exempt <50W	ER30 lamps, sold primarily in 50W and 75W versions in commercial installations, are also used in deeply recessed downlights. By allowing 50W versions or less, commercial users will have access to affordable energy saving directional lamps that fit into their existing installations and provide the unique light distribution for the application. This exemption is included in the CEC proposal.
R20	Exempt ≤45W	R20 lamps are used in both commercial and residential niche applications, with the 50W version being predominant. An energy saving 45W version is available, and this exemption would guarantee a 5W savings in this category. Eliminating this lamp altogether would drive users to more expensive alternatives, many of which are higher wattage.