



December 2, 2005

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

DOCKET	
05-AAER-2	
DATE	DEC 2 2005
RECD.	DEC 1 1 2005

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,


Kyle Pitsor
Vice President, Government Relations
National Electrical Manufacturers Association


Steven Nadel
Executive Director
American Council for an Energy-
Efficient Economy

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 a diameter of 2.25 inches or more to the definition of "Incandescent Reflector Lamp"	It is unclear from the current definition whether these types are covered or not. Including them in the definition removes ambiguity.
BR30	Exempt 65W and $\leq 50W$	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 alternative to higher wattages.
BR40	Exempt 65W and $\leq 50W$	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 $\leq 50W$	ER40 lamps are very low volume types—primarily 120W--used 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 $\leq 50W$	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 $\leq 45W$	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.