KYLE PITSOR

December 14, 2005

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

RE: NEMA A-line Statistical Wattage Survey

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 conduct a survey to characterize the U. S. A-line market by wattage. It was noted that the current data available to the commission and the consultants were rough estimates of market sales, based on limited retailer surveys.

Of particular concern was information on the 40-watt and 150-watt lamp categories. At significant expense to manufacturers, NEMA has offered to redesign the 60-watt, 75-watt, and 100-watt incandescent lamp types. Based on our market knowledge, we believed that these lamp types represent the majority of the units sold and the majority of potential energy savings. Even so, we are not convinced this will result in energy savings, as this depends on the consumer's response, which has yet to be evaluated. Based on their limited data, utility consultants suggested that the 40-watt and 150-watt types may represent substantial energy savings and should be investigated further.

The following chart shows the actual wattage distribution of A-line lamps sold in the U.S. market by NEMA manufacturers in 2004.

General Service Incandescent Lamps **Lamp Category**	**2004** **Percentage of Unit Sales**	**Percentage of potential Energy Savings based on a 5% reduction in wattage.**
25 Watt	1 % (1.2%)	0.4 %
40 Watt	12 %	7 %
60 Watt	46 %	40 %
75 Watt	19 %	21 %
100 Watt	21 %	30 %
150 Watt	1 % (0.7%)	1.6 %
Total	**100 %**	**100 %**

National Electrical
Manufacturers Association

While there was some concern at the workshop that the 40-watt category may represent close to 20% of lost energy savings potential, the actual data clearly shows that the 40- watt category only represents 7% of potential energy savings. The 150-Watt lamp, a niche product used in critical seeing applications, especially for the older-eye, only represents 1.6% of potential energy savings.

NEMA believes that these market data validate our position that the CEC should only propose a regulation on 60-Watt, 75-Watt, and 100-Watt lamp types. **The bottom line is that NEMA is offering to redesign 86% of our lamp types by volume, representing 91% of the potential energy savings in this category.** Since redesigns of the major A-line products and their packaging will significantly increase cost to manufacturers, it is unjustified to further burden industry by requiring redesign of niche product categories that have little potential for energy savings.

From a NEMA perspective, there is no justifiable reason to regulate a niche product, unless it becomes a high volume lamp type. A niche product, from an energy savings perspective, could be defined as a product that has only a single-digit energy savings potential. 40-Watt lamps, at 7% energy savings potential, 25-Watt at 0.4% energy savings potential, and 150-Watt at 1.6% energy savings potential clearly fit this definition. "Enhanced Spectrum" and "Vibration Service" would be covered by this definition as well.

Additionally, of great concern to NEMA, and what should be of great concern to the CEC, is unknown consumer behavior when presented with only lower-wattage lamp types. Some limited market data indicates that consumers have a different purchasing behavior skewed toward higher wattage lamps if only off-wattage lamps are offered. While NEMA first suggested a market test to evaluate consumer behavior, it should be very clear to everyone that an untested state regulation is being proposed. Actual energy savings are unknown, as this approach as never been attempted before, and it should be clear that energy savings could be zero or could even be negative.

NEMA believes the State should carefully evaluate the results of a regulation concerning 60-watt, 75-watt, and 100-watt products, before attempting to regulate any other products in this area. Again, this issue supports NEMA's strong contention that no other products, including the 40-watt, 150-watt, 25-watt, "Enhanced Spectrum, " Vibration Service," or any other niche product should be regulated at this time. It is very expensive and burdensome to industry and will produce little, if any, energy savings.

Sincerely,

Kyle Pitsor

Kyle Pitsor
Vice President, Government Relations