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April 22, 2008

Mr. Gary Flamm
Lighting Program Lead
California Energy Commission

Sent via Email to Gary Flamm at gflamm@energy.state.ca.us

Reference: Comments to T24 2008 Proposed, 15-day language

Dear Mr. Flamm:

Thank you for overseeing the cause of good lighting that is energy efficient in the state of California. Thank you for allowing us to be a part of the process.

The following are comments for your consideration relative to the proposed language in California Title 24 2008.

Section 119(l)(1)

The requirement that integral current limiter be permanently attached to the track so that the track will be irreparably damaged if the current limiter were to be removed after installation into the track is not true today and not practical. If the current limiter was in need of replacement, it should be able to be replaced in the field with a current limiter of the same rating without compromising the track. Do the current limiters currently on the market from ConTech or Lightolier comply with this requirement?

Section 130(e)(4)

It seems that this statement was amended to cover all Low Voltage lighting. If that is true, then the reference to UL2108 is an incomplete reference. UL2108 does not govern all low voltage lighting. For instance low voltage recessed lighting is governed by UL1598. Therefore the reference to "UL2108" should be changed to "the applicable UL standard".

Table 150-C

The requirements for High Efficacy Lighting do not seem to coincide with Energy Star Requirements. Specifically for Undercabinet Lighting, I would like to see an exception that states that Undercabinet lighting for kitchens that complies with Energy Star Requirements is considered high efficacy. This would encompass LED and Fluorescent sources. Without this exception, LED's fall short of the threshold. For this very specific category, there is a great opportunity to improve energy efficiency.

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Gary Flamm
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Please feel free to call or Email me with any questions. My phone is 847-813-8053, and my Email is cwalsh@junoltg.com. Thank you for your consideration of these comments.

Best regards,

Christopher Walsh
Vice President, Product Management
Juno Lighting Group