



NATIONAL ELECTRICAL MANUFACTURERS ASSOCIATION

June 25, 2008

DOCKET	
07-AAER-3	
DATE	JUN 25 2008
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Commissioner Jackalyne Pfannenstiel
Commissioner Art Rosenfeld
California Energy Commission
Docket Office
1516 Ninth Street, MS-4
Sacramento, CA 95814-5512

RE: Docket Number Docket Number 07-BSTD-1

Dear Commissioners Pfannenstiel and Rosenfeld:

The National Electrical Manufacturers Association (NEMA) appreciates the opportunity to submit a written code proposal pertaining to the California Energy Commission's (CEC) future Title 20 general service lamp standards. NEMA, which represents over 450 companies that manufacture products used in the generation, transmission and distribution, control and end-use electricity, strongly supports sound energy efficiency regulations, and we appreciate the close working relationship we have with the CEC.

During the recent CEC workshop on May 15, 2008, NEMA verbally stated concerns over the CEC's proposal for a general service lamp standard in 2018. The Energy Independence and Security Act (EISA) of 2007 clearly gives California the right to adopt two years early whatever new standard is set for this category; however, the 45 LPW value is not a standard per se – it is a backstop in the event that standards are late or are deemed not to save sufficient energy. Due to the importance of this issue, we wanted to submit an alternate proposal for your consideration.

Below is our proposal to replace the CEC's proposed adoption of a general service lamp standard of 45 lumens per watt in 2018.

“Effective January 1, 2018, the standards for federally regulated general service lamps shall be the same as those established by the Secretary of Energy in a rulemaking pursuant to 42 U.S.C. Sec. 6295(i)(6)(A), as amended by Section 321(a)(3)(v) of the Energy Independence and Security Act of 2007.”

Again, NEMA appreciates the attentiveness and cooperation of the CEC. Should you have any questions, please feel free to contact Dain Hansen at (703) 841-3200.

Sincerely,

Vice President
NEMA, Government Relations

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