

Comments on CEC 45-Day Language for Portable Luminaires

Presented to:

California Energy Commission



DOCKET

07-AFC-4

DATE SEP 17 2008

RECD. SEP 19 2008

Presented on Behalf of:

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September 17, 2008
CEC Efficiency Committee Workshop
2008 Rulemaking on Appliance Efficiency Regulations
Docket No. 08-AAER-2008

This presentation was prepared by Pacific Gas and Electric Company and funded by the California utility customers under the auspices of the California Public Utilities Commission.

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Outline of Comments

- PG&E is in general agreement with 45-Day Language for portable luminaires
- PG&E has comments on four issues:
 1. Opposed to exemption for wall-mounted luminaires
 2. Energy Star requirement for CFLs
 3. LED Lamp Definition

1. Exemption for Wall-Mounted Fixtures

PG&E opposed to this exemption

- Ship-With CFL option was originally proposed to accommodate products in the Long-Tail distribution
- Cost Effective: Even if dimmable CFLs cost \$10-15 (high estimate), they will have a 3-4 year simple payback
- Very low light levels from dimming could be met by LEDs as a primary or secondary source

2. CFL Energy Star Requirement

- Current 45-Day Language reads: “minimum energy-efficiency requirements established for 2008 by Energy Star”
 - On December 2, 2008, Version 3.0 will be replaced by Version 4.0
 - Current wording is ambiguous

Energy Star for CFLs Version 3.0

Lamp Power (Watts) & Configuration ¹	Minimum Efficacy: Lumens/watt (Based upon initial lumen data ²)
<u>Bare lamp:</u> Lamp power < 15 Lamp power ≥ 15	45.0 60.0
<u>Covered lamp (no reflector)</u> Lamp power < 15 15 ≤ lamp power < 19 19 ≤ lamp power < 25 Lamp power ≥ 25	40.0 48.0 50.0 55.0
<u>With Reflector:</u> Lamp power < 20 Lamp power ≥ 20	33.0 40.0

Energy Star for CFLs Version 4.0

Lamp Power (Watts) & Configuration ¹	Minimum Efficacy: Lumens/watt (Based on initial lumen data ²)	
	Efficacy requirements Medium screw-base	Efficacy requirements Candelabra screw-base
<u>Bare lamp (fixed light output):</u> Lamp power < 10 10 ≤ Lamp power < 15 Lamp power ≥ 15	50 55 65	50 55 NA
<u>Bare lamp (Dimmable/2-way/3-way):</u> Lamp power < 15 Lamp power ≥ 15	50 60	50 NA
<u>Covered lamp (no reflector):</u> Lamp power ≤ 7 7 < Lamp power < 15 15 ≤ lamp power < 25 Lamp power ≥ 25	40 45 50 60	35 45 NA NA
<u>Outdoor Reflectors:</u> Lamp power < 20 Lamp power ≥ 20	33 40	N/A

3. Definition for “LED Lamp”

- Section 4(A)4 references an “LED Lamp” but this term has not been defined.
- In the Express Terms (pg. 8) "LED Source" is mentioned; we believe the intended phrase may be "LED Light Source" since “LED Source” isn't separately defined.