



**Pacific Gas and
Electric Company®**

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October 10, 2008

Ms. Jackalyne Pfannenstiel
Chairman and Associate Member, Efficiency Committee

Mr. Arthur Rosenfeld
Commissioner and Presiding Member, Efficiency Committee

California Energy Commission
Buildings and Appliances Office
1516 Ninth Street, MS-25
Sacramento, CA 95814-5512

**Subject: PG&E Comments on Title 20 45-Day Language for Portable Luminaires;
RE: 2008 Rulemaking on Appliance Efficiency Regulations;
Docket No. 08-AAER-1A; Portable Luminaires**

Dear Ms. Pfannenstiel and Mr. Rosenfeld:

In general, PG&E supports the proposed 45-Day Language for Portable Luminaires. We believe the proposed standard provides flexibility through five different compliance options and will result in significant energy savings beyond those which will be captured through the general service lighting (GSL) standards and the proposed acceleration of the GSL standards in California.

Our written comments address the issues PG&E raised during the September 17th Hearing, namely: the importance of explicitly referencing ENERGY STAR Version 4.0 for compact fluorescent lamps (CFLs); the need to define “LED lamp”; and our opposition to granting an exemption for wall-mounted luminaires. In addition, after further review of the 45-Day Language, we also recommend adding clarifying language to ensure *only* CLFs or LED lamps are prepackaged and shipped with portable fixtures.

We appreciate your consideration.

Sincerely,

Patrick Eilert
Program Manager, Codes and Standards
Pacific Gas & Electric Company

ENERGY STAR Requirement for CFLs

Under Section 1605.3 (n) (4) (A4) of the 45-Day Language, CFLs shipped with portable fixtures are required to meet minimum energy efficiency requirements “established for 2008 by Energy Star for compact fluorescent lamps.” As we also pointed out during the September 17th hearing, the current language is ambiguous because there will be two ENERGY STAR specifications for CFLs active during the 2008 calendar year: Version 3.0, effective through December 1 2008, and Version 4.0, effective on December 2, 2008.¹ In our presentation on portable fixtures at the hearing, we highlighted that Version 4.0 is substantively different than Version 3.0. Specifically, Version 4.0 sets higher minimum efficacy requirements for most categories of CFLs, and also includes new categories not found in Version 3.0 (e.g., “dimmable/2-way/3-way”). To avoid confusion, we recommend the Commission adopt language which explicitly references the most recent ENERGY STAR requirement for CFLs (“ENERGY STAR Program Requirements and Criteria for CFLs – Version 4.0”). As an alternative if the Commission feels it can not reference a specific version of Energy Star, it could instead refer to the ENERGY STAR as in effect on December x, 2008, where x is some date during within the December 2 -31 time period (e.g., the date the final adoption hearing is scheduled for).

Defining LED Lamp

Currently, the term “LED Lamp” used in Section 1605.3 (n) (4) (A4) is not defined. We recommend the Commission define “LED Lamp” in a manner that is consistent with the definition currently used in the Title 24 Building Standards. To this end, we suggest the following definition be added:

“LED Lamp” is an integrated LED Package (or LED array, or LED module) having optical, thermal, mechanical and electrical components, an integrated LED Driver (Power Source), and an ANSI standardized base that is designed to connect to the branch circuit via an ANSI standardized lampholder/socket.

Exemption for Wall Mount Adjustable Luminaires

We have repeatedly stated during discussions leading up to the published 45-Day Language as well as at the September 17th hearing, we do not see a compelling reason why wall-mounted fixtures warrant an exemption. Shipping a CFL with these fixtures is cost-effective whether or not the fixture is placed on a floor, table, or is mounted to the wall.

At the hearing, the American Lighting Association (ALA) voiced some concern that because wall mounted fixtures are typically dimmable; should a consumer inadvertently replace their dimmable CFL with a non-dimmable CFL, there is some risk of electrical malfunction. In response, we contend this potential risk is likely small,² and exists whether or not wall mounted

¹ U.S. Environmental Protection Agency (2003). Energy Star Program Requirements for CFLs Partner Commitments. Final Version: October 30, 2003. Available at:

http://www.energystar.gov/ia/partners/product_specs/program_reqs/cfls_prog_req.pdf

U.S. Environmental Protection Agency (2008). Energy Star Program Requirements for CFLs Partner Commitments. Final Version: March 7, 2008. Available at:

http://www.energystar.gov/ia/partners/prod_development/revisions/downloads/cfls/Criteria_CFLs_V4.pdf

² We are unaware of any instances in which a fire, resulting from an electrical malfunction, has been attributed to a CFL being used with a dimmable fixture.

fixtures are exempted from this standard.³ We are confident that dimmable CFLs will become more widely available in retail stores, in part due to this standard. As this occurs, this potential issue will become even less of a concern. Hence, we recommend the Commission not include this exemption.

It is also our understanding that several other states have begun to look at this portable fixture standard as one to emulate. By including an exemption of questionable merit; there is the chance this exemption may not be carried over into the standards set in other states. This in turn may create undesirable inconsistencies between state standards.

Ensuring only CFLs or LEDs are Prepackaged with Fixtures

In Section 1605.3 (n) (4) (A4) that describes the compliance option of prepackaging fixtures with either a LED lamp or CFL, we recommend a sentence be inserted so that this section would read:

If equipped with an E12, E17, or E26 screw-based socket, the luminaire shall be prepackaged and sold together with one screw-based compact fluorescent lamp, or with one screw –based LED lamp for each screw -based socket on the portable fixture.
Luminaires may only be prepacked and sold together with LED lamp(s) or compact fluorescent lamp(s).

This change will eliminate the possibility that manufactures may prepackage a CFL or LED lamp with a fixture (perhaps calling it the “energy saving option”), and also an incandescent lamp. This outcome could significantly reduce the expected energy savings achieved from prepackaging CFLs or LED lamps with the fixture. Although we believe it’s relatively unlikely that manufactures will chose to prepackage two different lamps, we believe that this minor modification keeps with the original intent of this compliance pathway and closes off this possible loophole.

³ About 14% of households in California have at least one lighting fixture with dimming controls, and over 50% have at least one fixture with a 3-way switch. HMG (2001) Lighting Efficiency Technology Report: Volume 1 California Baseline. pg. 23. Accessible at: <http://www.h-m-g.com/downloads/LET/VOLUME01.PDF>