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December 2, 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 15-Day Language for
Portable Luminaires, General Service Lamps, and Metal Halide Luminaires**
RE: Appliance Efficiency Regulations 15-Day Language;
Docket No. 08-AAER-1A Portable Luminaires;
Docket No. 08-AAER-1A General Service Lamps; and
Docket No. 08-AAER-1B Metal Halide Luminaires

Dear Ms. Pfannenstiel and Mr. Rosenfeld:

The Pacific Gas and Electric Company (PG&E) appreciates the opportunity to provide input on this important rulemaking. Our comments are divided into three parts:

Part 1. PG&E Comments on Portable Luminaires

Part 2. PG&E Comments on General Service Lamps

Part 3. PG&E Comments on Metal Halide Luminaires

Comments on other standards in this proceeding will be provided under separate cover.

We appreciate your consideration.

Sincerely,

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

PART 1: PG&E'S COMMENTS ON PORTABLE LUMINAIRES

PG&E is pleased with the Energy Commission's proposed 15-Day Language for portable luminaires and supports adoption of this language at the Energy Commission Hearing on Wednesday, December 3, 2008.

We are also pleased the 15-Day Language for portable fixtures includes an explicit reference to the most current ENERGY STAR specification for compact fluorescent lamps (CFLs), effective December 2008, as we recommended through our comments on the 45-Day Language.¹ We have identified several minor issues with the 15-Day Language. However, given the Huffman AB 1109 goals, we do not believe these issues are substantive enough to warrant a delay in the adoption of this standard, which would be created if a second 15-Day Language is issued. Should this standard be adopted, we plan to follow up with the Energy Commission to discuss addressing remaining issues, for example, through administrative clarifications in the post adoption period.

PART 2: PG&E'S COMMENTS ON GENERAL SERVICE LAMPS

PG&E supports the Energy Commission's proposed 15-Day language for general service lamps and recommends the Energy Commission adopt this language at the hearing on Wednesday, December 3, 2008, pending several editorial changes which should not warrant a second 15-Day Language.

Specifically, we recommend the following editorial changes:

- **IMPORTANT.** Page 14, Table K-11: Column 2 heading should read "Maximum Rated Wattage", not "Minimum Rated Wattage Minimum".
- Page 14, Table K-11: Column 4, line 1, there is an extra comma following "Jan".
- Beginning on Page 13, Tables K-9 through K-11: The wrong word is pluralized in column heading. First column says: "Rated Lumens Range", or "Lumens Range". Change to "Rated Lumen Ranges" or "Lumen Ranges" to match EISA and to clarify meaning.
- Page 3, Definitions: The text added to the 15-Day Language to define modified spectrum matches the EISA language for the most part, except: the word "with" appears in EISA prior to "(x,y)" in both Sections 1 and 2. We suggested the following edit (underline text represents added language):
 - (1) Has a color point with (x,y) chromaticity coordinates on the Commission Internationale de l'Eclairage (C.I.E.) 1931 chromaticity diagram that lies below the black-body locus, and
 - (2) Has a color point with (x,y) chromaticity coordinates on the C.I.E. 1931 chromaticity diagram that lies at least 4 MacAdam steps distant from the color point of a clear lamp with the same filament and bulb shape, operated at the same rated voltage and wattage. The MacAdam steps are defined as referenced in Illuminating

PART 3. PG&E'S COMMENTS ON METAL HALIDE LUMINAIRES

PG&E supports the Energy Commission's proposed 15-Day Language for metal halide luminaires, and recommends the Commission adopt this language at the hearing on Wednesday, December 3, 2008. In particular, we are pleased the Commission has incorporated several of the changes PG&E recommended in the written comments submitted in response to the 45-Day Language, including the revised wattage

¹ Eilert, P. (2008) "PG&E Comments on Title 20 45-Day Language for Portable Luminaires." Submitted to the California Energy Commission. 10 October 2008. Accessible online at: http://www.energy.ca.gov/appliances/2008rulemaking/2008-AAER-1A/public_comments/Portable_Luminaires/PG+E_Comments_on_45-Day_Language_TN-48538.PDF

ranges for the low-wattage compliance option, and the exception for the use of high-efficacy, higher-wattage lamps within the low-wattage compliance option.² We are also pleased with the separate requirement for indoor applications in lieu of the sunset provision for the lower wattage lamp option, which requires reduced wattage lamps (with the exception for high-wattage, high efficacy lamps) *and* either high efficiency ballasts or lighting controls beginning in 2015.

We believe the exception for luminaries that operate 336W to 500W lamps within the low-wattage compliance option, provided these luminaries be pre-packaged and sold with a lamp that has a minimum mean efficacy of 80 lm/W, provides a reasonable alternative to banning high-wattage fixtures indefinitely. This exemption allows higher-wattage fixtures to be used in applications where they can reduce overall energy consumption by increasing fixture spacing and reducing the number of fixtures used in a space, and as a result will save consumers money on energy and upfront installation costs while also enabling greater lighting design flexibility.

² Eilert, P. (2008) "PG&E Comments on Title 20 45-Day Language for Metal Halide Luminaires." 13 October 2008. Submitted to the California Energy Commission. Accessible online at: http://www.energy.ca.gov/appliances/2008rulemaking/2008-AAER-1B/public_comments/Metal_Halide_Luminaires/Pacific_Gas_and_Electric_Comments_on_Title_20_45-Day_Language_TN-48566.PDF