

29 September 2011

California Energy Commission  
Dockets Office, MS-4  
Re Docket No. 11-AAER-1  
1516 Ninth St.  
Sacramento, CA 95814-5512

# DOCKET

11-AAER-1

DATE SEP 29 2011

RECD. OCT 03 2011

## **Comments Regarding Docket Number 11-AAER-1 2009 Rulemaking Proceeding on Appliance Efficiency Regulations Phase II**

On behalf of the American Lighting Association (ALA), we appreciate the opportunity to expand on our verbal presentation to the California Energy Commission (CEC) on 31 August 2011, regarding revisions to the Appliance Efficiency Regulations (Title 20, Sections 1601-1608) with regard to residential lighting products. The ALA represents primary stakeholders in the area of residential lighting, including manufacturers; manufacturers' representatives; retailers; and designers in the United States, Canada and the Caribbean. The ALA supports and participates in efforts to make residential lighting more energy efficient and to reduce lighting energy use.

We believe it is important for the lighting industry to continue to work and partner with the CEC to find positive and productive ways to enhance the efficiency of lighting products sold in California. Ideal solutions will improve the efficiency of lighting products without being punitive or unduly expensive for the industry or limiting consumer choice, which will encourage new and innovative energy-efficient product development, and benefit California jobs and tax base.

### **Meeting the California Residential Lighting Mandate**

We understand the CEC has a mandate from the California legislature to reduce lighting energy consumption by 50 percent by 2018. To accurately make recommendations to help meet that goal, the ALA requests an assessment of the CEC's progress to date. A detailed understanding of the gains that have been attained as a result of actions already taken by the CEC and federal government – including efficiency gained in lamps, portable fixtures, ceiling fans, torchieres, etc. – will allow the CEC staff, the ALA and others to develop effective and workable recommendations.

### **ALA Recommendations**

Thus far, efforts by the CEC to reduce the energy used by residential portable luminaires in California have been primarily focused on ways to make such products more efficacious (lumens/watt). Energy efficient products are therefore currently defined as those using less power (watts). The relationship between power and energy, however, is **Energy = Power x Time**.

We believe, there is a time component to reducing energy use that is not currently being taken into account. The ALA feels that by concentrating only on the “power” aspect of lighting energy reductions that not only is there a point of diminishing returns because of technology limits and the investments that can be made in new light sources and luminaires, but that residential lighting energy use in California is not being reduced as much and as fast as it might be.

Also, in order to reach the energy efficiency objectives for California, it is imperative to encourage industry competitiveness so new products can be developed and moved into the market quickly. This cannot be achieved by focusing solely on light source and luminaire requirements. How the residential user wishes to operate that system to gain quality lighting must be considered as well.

Industry innovations and competitiveness are diminished substantially by restricting:

- Consumer luminaire choices
- Expensive performance testing and reporting that require third-party laboratories
- Similar, but not identical, product testing and reporting requirements compared to U.S. federal requirements
- Luminaire light output distribution requirements

The ALA recommends moving toward a bigger-picture approach of regulating energy use of the luminaire light source system (lamp, ballast or LED driver plus controls), rather than the present limited design requirements for fixtures. With regulation refocused on the use of energy, such regulation will then drive light source, luminaire and operational efficiencies in ways that will optimize design, operation, use and investment.

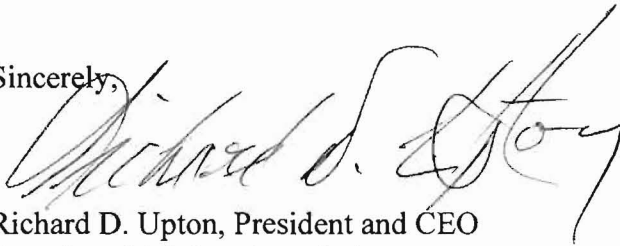
This new “energy” approach will benefit California by:

- Minimizing consumer costs due to “California only” product listings
- Eliminating the attractiveness of “black market” or Internet sales and the subsequent loss of California tax revenues
- Maximizing consumer choice, which encourages replacement of older less-efficient products with new products

More than 80 percent of consumers shop via the Internet prior to purchasing according to ALA retailers. If there is a far greater assortment of lighting products available on the Internet than is available at California brick and mortar retailers, sales will migrate to the Internet and the California energy-efficiency lighting targets will be delayed or not achieved.

The ALA is committed to working with the CEC to develop a comprehensive and successful plan to minimize the energy use of residential lighting products in California.

Sincerely,

A handwritten signature in dark ink, appearing to read "Richard D. Upton", written in a cursive style.

Richard D. Upton, President and CEO  
American Lighting Association  
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Dallas, TX 75207-3206

Cc: 1 paper copy to: California Energy Commission, Dockets Office, MS-4, Re Docket No. 11-AAER-1, 1516 Ninth Street, Sacramento, CA 95814-5512.