

October 24, 2012

VIA EMAL TO: Gary.Flamm@energy.ca.gov

California Energy Commission
DOCKETED
012-BSTD-03
TN # 68084
OCT 24 2012

Mr. Gary Flamm

California Energy Commission

**Cooper Lighting comments on Proposed Voluntary California Quality Light-Emitting Diode (LED) Lamp Specification
CEC-400-2012-016-SD**

Dear Mr. Gary Flamm,

Cooper Lighting appreciates the opportunity to provide the comments on the subject proposal.

Thank you for your consideration of these comments. If you have any questions on these comments, please contact Greg Wronski at 770-486-4236 (greg.wronski@cooperindustries.com) or John Green at 770-486-4107 (john.green@cooperindustries.com).

Sincerely,

Greg Wronski

Chief Engineer



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Cooper Lighting Comments on **Proposed California Quality Light-Emitting Diode (LED) Lamp Specification**
CEC-400-2012-016-SD

General Comments:

The minimum standards for LED lamps proposed by California Energy Commission that refers in general to the Energy Star requirements may mislead consumers and create confusion. Also may add an unnecessary product qualification step for manufactures.

Comments by Page:

Page 18, Eligible Lamp Bases and Lamp Shapes

- a) The table on Page 18 does not list all eligible lamp shapes. The text below the table lists additional lamp shapes that can be considered and should be outlined in the table. The proposed groups of lamp bases do not demonstrate practical combinations of lamp types and lamp bases.
- b) The revised table (below) includes all lamp shapes and proposed changes as follow:
 - Added "T" shape to the last column
 - Combined PAR30 and PAR38 lamps together (PAR30 should not be offered with GU-10 base)
 - Separated the following lamp shapes to (3) groups: (A), (G) and (B, BA, C, CA, F) – A type lamp should not be offered with E12 and E17 bases, B, BA, C, CA, F type lamps should not be offered with E26 and GU-24 bases.
 - Removed G8 and G9 from MR shape (MR type lamp is not offered with G8 and G9 bases.
 - Remove PAR30 lamp from GU-10 base (See above)
 - Added PAR16 lamp to PAR20 column (PAR16 lamp type should be added)

		Figure 5: Eligible Lamp Bases and Lamp Shapes						
		Lamp shape						
		A	G	B, BA, C, CA, F	MR	PAR16, R16, PAR20, R20, BR20	PAR30, R30, BR30, PAR38, R40, BR40	JC Bi-pin wedge, T
Lamp base	E12, E17	X	Omidirectional	Omidirectional	X	X	X	X
	E26, GU-24 (120V)	Omidirectional		X	X	Spotlight	Spotlight or Floodlamp	X
	GU-10 (120V)	X	X	X	Spotlight	Spotlight	X	X
	GX5.5 (12V)	X	X	X	Spotlight	X	X	X
	G8, G9 (120V)	X	X	X	X	X	X	Omidirectional

Additional Comments:

The LED lamps outlined in the CEC proposal are intended for use by consumers and majority of lamps to be installed into existing luminaires. Since the LED lamps are constructed with heavy heat sinks the weight of the lamp is greater than the incandescent lamp weight. Some of the proposed sockets may not adequately hold the lamp in luminaires where the lamp is only supported by a socket. Example PAR38 / GU-24 combination.