



October 25, 2012

To: The California Energy Commission Sacramento, California Dockets Office,
MS-4

From: Richard D. Upton, President and CEO and
Terry McGowan, Dir. of Engineering
The American Lighting Association
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Subject: ALA Comments on Rulemaking for California Quality Light Emitting Diode (LED) Lamp Specification. Docket #12-BSTD-03

The American Lighting Association (ALA) as the North American lighting trade association* with 145 member companies in California wishes to comment with regard to the subject specification relating to LED screw-in lamps for residential general lighting.

1. The ALA supports California's and the CEC's ongoing efforts to improve lighting energy efficiency in homes especially when those efforts encourage the proper application of light, a choice of lighting products and quality lighting. Our members strive to provide products which deliver the right amount of efficient light for the task or room, pleasing color tone, accurate rendering of colors and product performance which residential consumers find suitable and appropriate for their homes.
2. We note, however, that ongoing efforts, especially since 2006, to replace less efficient incandescent lamps with more efficient CFL and LED lamps in existing residential sockets have not been particularly successful with the socket saturation levels typically between 20-30 percent.**

There are several reasons for the low acceptance rate according to the analyses that we have seen; but, based upon reports from our ALA retail members, lighting quality concerns and, particularly, the difference in the color and quality of the light from the more efficient products compared to traditional incandescent light sources, remains a major reason why consumers are reluctant to make the conversion to more efficient sources.

3. Accordingly, the ALA supports the CEC's effort to develop proposals for a highly-efficient "California Quality" LED screw-in lamp moving toward the light quality and color of traditional incandescent lamps.

4. We agree that the proposals should lead to voluntary rather than mandatory product use allowing for customer light source choice and the proper positioning of the proposed product in the consumer marketplace.

Thank you for the opportunity to express our views on this matter.

*The ALA is a trade association with 3,000 members representing the manufacturers of lighting fixtures, lamps, components, controls and ceiling fans and includes manufacturers' representatives; retailers and lighting designers in the United States, Canada and the Caribbean.

**ENERGY STAR CFL Market Profile, U.S. Dept. of Energy, September, 2010.