

Energy - Public Adviser's Office

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Sent: Wednesday, December 12, 2012 10:17 AM
To: Energy - Public Adviser's Office
Subject: Energy Commission Business Meeting 12 Dec 2012

On behalf of Philips, I submit the following opinion on the VOLUNTARY CALIFORNIA QUALITY LIGHT-EMITTING DIODE (LED) LAMP SPECIFICATION (Item 6 on the agenda).

For CFL's overemphasis was placed on cost, and performance was underemphasized.

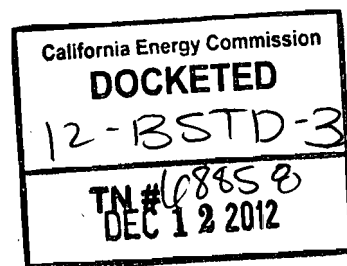
For SSL, our belief is that the CA bulb spec is taking the opposite approach: Overemphasizing performance and underemphasizing cost. This will have the same detrimental effect. Rebate budgets will not go far, if bulbs are unnecessarily expensive and the rebate is substantial.

We believe that the Energy Star specification is a good spec for the nation and for CA. We highly favor working within this framework.

The particular specifications that will cause unnecessary cost increase, with no benefit in the vast majority of applications, include: CRI 90, R9 > 50, PF > 0.9.

Philips has submitted other comments in the process of preparing the proposal. Some of these are on the public docket. Some were provided in confidential form. We continue to stand by those comments.

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