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California Energy Commission

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Mr. Andrew McAlister
Commissioner
California Energy Commission
1516 Ninth Street
Sacramento, California 95814

Eaton's Cooper Lighting Business Comments on Staff Workshop on Proposed Lighting Efficiency Measure for Residential and Nonresidential Buildings

Dear Commissioner McAllister,

Eaton's Cooper Lighting (hereafter referred to as "Cooper") would like to thank you for the opportunity to provide comments on the California Energy Commission's Staff Workshop on Proposed Lighting Efficiency Measures for Residential and Nonresidential Buildings.

Eaton is a leading diversified, global power management company that is fundamentally committed to helping the world to use less energy and to use energy safely. Our innovative technologies and services help customers manage electrical, hydraulic and mechanical power, safely and efficiently. In addition, these power management technologies help customers control costs and reduce their energy requirements.

Eaton's Electrical Products and Services businesses are global leaders in power distribution, power quality, control and automation, power monitoring, and energy management products and services. We deliver a range of innovative and reliable indoor and outdoor lighting and controls solutions, specifically designed to maximize performance, energy efficiency and cost savings. The Lighting business serves customers in the commercial, industrial, retail, institutional, residential, utility and other markets. We currently employ over 35,000 people nationwide with over 1,600 of those residing in California.

Eaton has worked hard as an organization to position ourselves as the global leader in the development and sale of solutions aimed at addressing the critical societal goals of reducing emissions and decreasing energy consumption. Eaton provides insight as a global leader in efficient lighting solutions and a major stakeholder in the electrical industry. Our comments are aimed at helping deliver to our customers energy savings at the least cost with improved performance.

Please see our comments below

Cooper Lighting
by 

Residential

Consumers select lighting products based on the intended use. Attributes that may be important for one area may not be as crucial in another area. Consumers like to have a choice in their selections and will make that choice based on cost, performance, and application. For that reason we would recommend continuing to offer the consumer the current option of a range of color temperature from 2700K – 4000K. We feel that only allowing color temperatures 3000K or less is too restrictive and does not provide enough options for the consumer.

We suggest that CEC give more consideration to the proposal that would allow screw base lamps in all luminaires with the exception of recessed downlights. Our concern is that less energy efficiency technologies could and will be installed after the initial inspection. We suggest continuing the restriction that exist currently in Title 24 2013.

With the numerous quality attributes proposed for JA8 qualified product, I would suggest the CEC review the requirements again and possibly conduct a workshop focused just on JA8 compliance qualifications. While quality is of course a consideration when selecting product, cost is also a huge consideration. If the proposals only allow for premium products with a higher cost you may well see a lower penetration of new technology in California in comparison to other areas of the country. We would ask that you reconsider both the CRI 90 requirement and the color rendering R9 value.

We would also ask that you review the requirement for recessed luminaires in “dwellings” to be both listed for zero clearance insulation contact (IC) and have a label that certifies that the luminaire is airtight (AT) with air leakage less than 2.0 CFM at 75 Pascals when tested in accordance with ASTM E283. We would ask that you consider changing the verbage to – *Recessed luminaires shall be listed for zero clearance (IC) when insulation is required or present and have a label that certifies that the luminaire is airtight (AT) with air leakage less than 2.0 CFM at 75 Pascals when tested in accordance with ASTM E283. Luminaires shall have a label that certifies that the luminaire is airtight (AT) with air leakage less than 2.0 CFM at 75 Pascals when tested in accordance with ASTM E283 when insulation is **not** required or present.* In many High Rise Residential properties, Hotel/Motels, etc. the dwellings do not have insulated ceilings therefore the IC rating is unnecessary.

We ask that the Commission also consider the requirement for minimum rated life and warranty. This is a financial decision made by the manufacture and is not appropriate in an energy standard.

The .03 required start time will add cost to a product when we have no data to substantiate that start time is an issue. We ask that this requirement be removed or changed to a more reasonable value.

Non-Residential Outdoor Lighting

We support a LPA baseline that is based on LED technology; however we have concerns on those baselines being calculated on “projected” 2017 efficiency levels. We would like to fully evaluate the models that were used to calculate the new LPA levels before we further comment on this section.

Thank you for the opportunity to comment and we look forward to working with on this important initiative.



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