



Manufacturers of Light Bulbs

California Energy Commission

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Submitted via email: [docket@energy.ca.gov](mailto:docket@energy.ca.gov)

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

**Feit Electric Comments on Staff Analysis of Small Diameter Directional Lamp and Light Emitting Diode Lamp Efficiency Opportunities**

Dear Commissioner McAllister,

Feit Electric Company appreciates this opportunity to comment on the California Energy Commission's staff analysis for Small Diameter Directional Lamp and Light Emitting Diode Lamp Efficiency Opportunities. We share, support, and promote the Commission's goal to save energy in the State of California. With this understanding, we submit the following information:

LED Lamps:

1. Feit Electric Company supports the Commission's goal that requires LED lamps to meet the consumer's expectations for quality and performance. We are not aware of dissatisfaction with LED lamps having a CRI of 80 or higher. We understand and support the Commission's belief that 90 CRI lamps will also satisfy the consumer.
2. In order to promote the higher specification of 90 CRI lamps, the Commission should have California Utilities rebate only 90 CRI lamps that meet the Minimum Voluntary LED Lamp Specification. However, all lamps that meet the Federal minimum efficiency standards should continue to be allowed for sale in the State of California. Since California will offer rebates only on lamps that meet the Minimum Voluntary LED Lamp Specification, these products will have lower retail prices and thus will be preferred by consumers who will choose them through the free market system.
3. Many of our major retailer partners have expressed a deep concern about the potential escalation of SKUs that is possible if they are required to stock lamps that meet the California specification in addition to other lamps for the rest of the country. Some retailers have discussed dropping this category altogether to avoid possible serious logistical, administrative, legal, and cost issues with maintaining separate inventories.

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Small Diameter Directional Lamp comments:

1. The current scope definition is too broad and should be changed to allow for the exemption of niche specialty application halogen MR lamp types that do not have viable LED alternatives. The scope should be limited to the types of small diameter lamps that are used in most general lighting applications and that fit into most existing fixture types. Some halogen MR16 lamps need to remain on the market to address existing applications that would be technically and/or economically infeasible to convert to LED lamps.
2. Currently available LED small diameter directional lamp categories operate at efficiency levels that are much lower than the proposed 80 LPW. Establishing an 80 LPW efficiency requirement for MR lamps is premature and is not projected to reach this level in the next couple of years. To achieve 80 LPW, while reaching the proposed dimming requirement would require additional LEDs and a larger heat sink which would increase the physical size of these lamps. Not only would costs be much higher, but the larger size bulbs would not fit in most current applications.

In summary, Feit Electric Company thanks you for the opportunity to share our concerns with you.

Thank you for your time and consideration.

Best regards,

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