May 9, 2015

To: docket@energy.ca.gov
Re: Docket No. 15-BSTD-01
California Energy Commission
Docket's Office, MS-4
1516 Ninth St
Sacramento, CA 95814-5512

Subject: Adoption of 15-Day Language for the 2016 Energy Efficiency Building Standards

Thank you to the Commission for reviewing comments below from MaxLite.

Please see our comments below regarding Title 24 Part 6, Final 15-day language:

Section 150.0, (k) Residential Lighting

1. H. Enclosed Luminaires
This sections states "Light Sources that are NOT marked JA8-2016-E shall not be installed in enclosed luminaires."

This language seems in direct contradiction with elements of Table 150.0-A which intend to quickly show that items in left column of this table are immediately identified as High Efficacy light sources.

Note that it is the understanding of MaxLite that the Commission intends to allow incumbent efficient fluorescent light sources, such as CFLs with GU24 bases to be utilized for high efficacy. In Table 150-0-A, it states that GU24 CFL light sources would be high efficacy, however this section 150.0 (h) states ALL light sources must meet JA8 if used in enclosed luminaires, which would include GU24 CFL sources that have been specifically designed to operate in enclosed environments. Such a requirement essentially eliminates CFLs from being used in enclosed residential luminaires.

MaxLite and others have worked with luminaire manufacturers for years to ensure that certain GU24 CFL light sources operate properly in enclosed fixtures, and there is a high volume of (mostly ENERGY STAR Certified) enclosed fixture products being sold for residential use through builders and through big box retailers that operate very successfully using GU24 CFLs that are enclosed rated. Eliminating their use would needlessly limit customer choice and availability of products.

MaxLite recommendation: Remove requirement that ALL light sources used in enclose luminaires must be JA8 compliant.

3. A Residential Outdoor Lighting

This section requires that residential outdoor lighting shall be controlled by a manual on/off switch AND either controlled by a photocell/motion sensor or some other control device.

Photocells were introduced as part of the requirements for residential outdoor porch lanterns in the ENERGY STAR Luminaire specification in approximately 2006, along with similar requirements at the time for Title 24. The results were widespread failures of products due to the poor performance of low quality photocells that were forced into these decorative fixture designs.

Stray light causing false triggers when fixtures were on, early failures of the photocells themselves, frequent switching issues causing CFL sources to die early, etc. caused so many problems for builders and manufacturers alike, that these requirements were swiftly removed from the ENERGY STAR specifications.

It is likely that many builders will want to use fixtures with integral photocells to satisfy this requirement, and the result could be a repeat of the same issues that were experienced with such decorative fixtures in the past.

MaxLite recommendation: Remove integral photocell as an optional requirement for compliance to this section of T24.

JA 8.5 Marking

MaxLite thanks the Commission for reducing the amount of marking required for light sources under JA8.5, versus earlier drafts of T24 2016. We also appreciate the special consideration included for lamps of very small size. This significantly helps the burden for source manufacturers.

We support the language of the JA8.5 remaining as written showing “Light Sources shall be marked with JA8-2016.” There have been some supplemental documents to the Final 15-Day language (not produced by the California Energy Commission) that indicated perhaps the Commission would require a permanent marking showing “JA8-2016” on the JA8 sources and this document also made it clear that no stickers would be allowed.

Note that IF there are nuances to this language added by the Commission that prevent the use of stickers, that this may be problematic unless specific clarity is given. Manufacturers of fixtures routinely use semi-permanent stickers such as UL labels to indicate product Safety compliance etc.

MaxLite recommendation: Keep language in JA8.5 precisely as written, do not provide any supplemental documents that prohibit the use of stickers without specific clarification and/or allowance of certain types of stickers.

JA10 Flicker

MaxLite opposes the use of a flicker test that has not been standardized or widely utilized by the general lighting industry for the types of light sources that will be in high demand for use in California in 2017.

MaxLite recommendation: We support the use of a more industry recognized approach to flicker testing such as IEEE PAR1789.

Regards,

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