

June 9, 2015

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

California Energy Commission

DOCKETED

15-BSTD-01

TN # 759GF

JUN 09 2015

Submitted via email to: docket@energy.ca.gov

Comments from the American Lighting Association on the 15-Day Language for the Residential Building Energy Efficiency Standards and Associated Documents (Title 24). Docket: 14-BSTD-01

Submitted via e-mail

Dear Commissioner McAlister,

The American Lighting Association (ALA)* submits the following comments on behalf of its members in response to the publication of the 15-Day Language and Additional Documents for the 2016 Building Energy Efficiency Standards. The ALA comments are specifically directed to the residential lighting requirements.

Both the lighting industry and the Commission have worked hard on these proposed standards and we appreciate the dedicated efforts of all to simplify the requirements as well as to recognize the progress that has been made in the development, promotion, acceptance and adoption of residential high-efficacy lighting products and lighting systems.

We expect the elimination of specific requirements regulating the mixture of high-efficacy luminaires by room and the qualification of luminaires which utilize common "E" sockets to substantially expand consumer luminaire choice and the faster adoption of higher-efficacy and consumer-acceptable products. As we said in our earlier comments this year, we view the current generation of integral LED lamps and light engines as not only being the best engineered and performing products available so far, but also, given the ongoing improvement and cost reductions, they will become even more attractive to specifiers, contractors and users. Making them available in familiar and standard forms can only accelerate adoption and user satisfaction with these new products.

Specific comments that apply to Section 150 and Appendix JA8

1. Allowable LED Light Source Configurations. LED technology has been shown to be adaptable to all types of luminaires and can be properly used in the form of light engines, modules or integral lamp products. We feel that, for continued development of energy-saving options, manufacturers should be allowed to determine which option makes the most sense for a particular luminaire type – including downlights. While we understand the concerns about the thermal management of LED products in downlights and enclosed fixtures, we note that both GU-24 and “E” type sockets have similar thermal characteristics, so the present language limits options rather than allowing the choice of the best option.
2. JA8.5 Marking. The ALA continues to object to the special California-only marking of products which raises costs and complicates ordering, shipping and stocking such products. Further, requiring printed markings ignores the successful and long-standing practice of marking lighting products for electrical and fire safety using stickers.
3. Flicker. Much has been learned about flicker since the standards referenced in the 15-day language were written. The ALA feels that standards which are known to properly reflect the flicker performance of LED products, such as those developed by the IEEE PAR1789, should be used.
4. Color Temperature. It is good to see more options for CCT values such as the inclusion of CCTs at “3000 Kelvin or less...”, but our view is that CCT restrictions should be eliminated to allow for the growing preference being shown by consumers for “warm dim” as well as higher CCT products. ALA retailers report that consumers now better understand their chromaticity choices thanks to the educational efforts of lighting manufacturers, retailers, utilities, energy organizations and others and there is now little reason to restrict their choices.
5. Photocells and Outdoor Lighting Products. The problem of properly applying a simple luminaire-mounted photocell control to luminaires using integral CFL or LED sources are well known and a source of continuing frustration to consumers. The ALA feels that such controls should not be required as part of the luminaire since, as the use of longer-lived LED products increases, the photocell will more likely need replacement than the light source further adding to user frustration.

The ALA thanks you and the Commission for this opportunity to comment.

Respectfully,

A handwritten signature in black ink that reads "Eric Jacobson". The signature is fluid and cursive, with the first name "Eric" and last name "Jacobson" clearly legible.

Eric Jacobson
President/CEO

* The American Lighting Association is a trade association representing over three thousand members in the lighting, ceiling fan and controls industries in the United States, Canada and the Caribbean. Our member companies are manufacturers, manufacturer's representatives, retail lighting showrooms and lighting designers who have the expertise to educate and serve their customers. There are 134 California members consisting of 18 designers, 4 associate members, 29 manufacturers, 25 manufacturers' representatives and 58 retail companies with 103 store locations.