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Mr. R. Michael Martin
Mr. Jim Holland
California Energy Commission
1516 Ninth Street, MS-25
Sacramento, CA 95814-5512

Subject: Title 20 – MH Luminaires

Dear Mr. Martin / Mr. Holland:

This letter is in regard to the 2005 Title 20 Appliance Efficiency Regulations, specifically the requirements for Metal Halide Luminaires.

My company in addition to NEMA has provided comments with regard to the availability of pulse start metal halide lamps in all wattages and burning positions since December 2004. We appreciate the on-going discussions and the meeting on August 30 with regard to this part of the standard. I would like to thank the Commission for removing requirements for horizontal lamp position luminaires and electronic ballasts in the 2005 regulations until further studies can be conducted.

Our company has widely promoted the pulse start technology for indoor industrial applications where it provides significant advantages to the customer, and we endorse Title 20 regulations for vertical base up metal halide luminaires. However, CEC has not conducted the required studies with regard to cost effectiveness, energy savings potential or supply / demand to regulate vertical base down lamp position luminaires at this time.

I would like to reiterate previous recommendations that have been made to the Commission regarding vertical base down lamp positions, especially when used in outdoor luminaires. The Commission should either:

(1) remove vertical base down lamp position MH luminaires from this current regulation, or

(2) exempt MH outdoor luminaires from the non-probe start ballast requirements

The study upon which CEC based this regulation did not evaluate specific details of lamp burning position and did not include an energy or cost savings analysis specific to outdoor luminaires. There are several wattages where only one vendor (with the smallest production capability of the top four lamp companies) can supply a vertical base down lamp. In some cases there are no vendors who manufacture a vertical base down lamp, such as the 175w which is a high volume outdoor product. While there have been discussions about substituting the 150w for a 175w lamp, the 150w has a different base than current 175w outdoor luminaires requiring alterations to the luminaire design, testing and certification.

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The non-probe start technology is not commonly used for outdoor luminaires and we do not know what the performance and reliability characteristics will be for products that don't exist today. In outdoor lighting, issues such as less regulated power quality, vibration and temperature extremes may present product reliability concerns that must be fully evaluated and resolved before a class of products should be subjected to regulation.

Lamp vendors will no doubt be developing an expanded line of pulse start lamps between now and 2008, however the Title 20 regulation is based on an unsubstantiated study and speculation that a sufficient supply of lamps will be available in vertical base down for all wattages with sufficient time to allow luminaire manufacturers to perform the necessary changes to product design, testing, certification and sales management prior to January 2008.

For the same reasons the Commission decided to postpone the regulation of horizontal lamp position MH luminaires, I strongly urge the Commission to postpone the regulation of vertical base down lamp position Metal Halide luminaires to a future date or exempt outdoor lighting until a point in time when the required studies have been conducted.

We will be glad to work with the Commission to conduct the necessary studies and will promote pulse start technology for outdoor lighting when the product has been proven to meet reliability requirements and there is sufficient availability of lamps in all wattages and burning positions.

Best regards,

Cheryl R English

Cheryl English
Vice President, Engineering Services & Industry Relations

cc: Tim Tutt
John Wilson
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