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October 20, 2008

Ms. Jackalyne Pfannenstiel
Chairman and Associate Member, Efficiency Committee

Mr. Arthur Rosenfeld
Commissioner and Presiding Member, Efficiency Committee

California Energy Commission
Buildings and Appliances Office
1516 Ninth Street, MS-25
Sacramento, CA 95814-5512

Sent via e-mail to: Docket@energy.state.ca.us

Subject: ALA Comments on Title 20 45-Day Language for Portable Luminaires – Response to PG&E Letter of 10/10/08

RE: 2008 Rulemaking on Appliance Efficiency Regulations; Docket No. 08-AAER-1A; Portable Luminaires

Dear Ms. Pfannenstiel and Mr. Rosenfeld:

The American Lighting Association appreciates this opportunity to comment on the 45-Day Language for Portable Luminaires and to answer the question raised by PG&E in their 10/10/08 letter about the proposed exemption for portable, wall-mounted, adjustable luminaires.

Overall, the ALA feels that our joint discussions and the careful analyses by the various stakeholders have been successfully translated into the 45-day language. The results will not only be substantial residential lighting energy savings; but also sensitivity to the consumer's need to have affordable and value-oriented lighting products in the marketplace. We look forward to turning these ideas into actual savings via products that our customers will want to buy.

The PG&E letter of 10/10/08 clears up some details which we too feel are important regarding ENERGY STAR requirements for CFLs and the definition of LED lamps; but there seems to be a misunderstanding about the reasons that we asked for the exemption for residential portable, wall-mounted, adjustable luminaires.

The reasons are both customer and application based. Customers clearly want some lighting in their homes to be fully dimmable (i.e. it must be easily adjustable down to 1% or less of full output.) Applications vary, of course; but bathroom lighting, hallway lighting, indoor security lighting, bedroom lighting and lighting in children's rooms are important. (Most families with small children are well aware of the demands to "leave a little light on" at bed time and a dimmer, from our experience, is an excellent way to negotiate what the child wants vs. what is acceptable to parents).

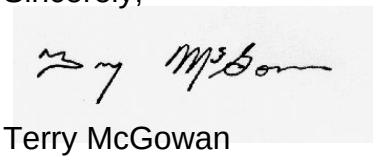
Unfortunately, even dimmable integrally-ballasted CFLs cannot be dimmed well enough with existing dimmer equipment to meet the application requirements (CFLs typically dim to only about 40% of full output before flickering or going out). Alternative light sources such as LEDs on dimmers will perhaps meet these needs in the future; but LED dimming systems are just being developed and the cost of portable LED luminaires is, at present, many times the cost of portable dimmable incandescent luminaires. Most of the luminaires in these applications are designed to be simple and low-cost.

We also have a safety concern about luminaires equipped with dimmers where a non-dimmable CFL might be installed by mistake.

So, the reason that we have proposed this exemption is to meet an important customer requirement involving a small sub-set of portable luminaires. This need cannot be met simply and economically in any other way at this time.

Thank you for your consideration.

Sincerely,



Terry McGowan

Cc: Gary Flamm