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LIGHTING

February 23, 2015

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

Letter in Support of the CEC's EPIC Investment in the CLTC

Dear Commissioner McAllister,

On behalf of Hinkley Lighting, please accept this letter advocating the California Energy Commission's continued support of the California Lighting Technology Center (CLTC), University of California, Davis, through the Electric Program Investment Charge (EPIC) Investment Plan. We at Hinkley Lighting feel the CLTC is a remarkable asset to the CEC and the people of the State of California. The CLTC works diligently with both the public and private manufacturers to apply lighting technology for quality of life improvements and energy savings.

Hinkley Lighting's involvement with the CLTC is largely driven by the commitment to meet Title 24 product requirements. It is in this continued endeavor we find the role of the CLTC to be ever more important. Proposed changes to the 2016 Title 24 will require increasing levels of consumer education, as the use of LED lamping technology, either in GU24 or Edison base format, comes with additional rules of application to ensure lamp life and performance. The extent to which these nuances are effectively communicated to consumers will impact the level of consumer acceptance and energy reduction achieved.

The unfortunate part is many of these rules are yet to be determined. As the proposed code reflects, LED lamps are not suitable for use within recessed ceiling fixtures; however, the proposed code remains undefined for any other fully enclosed or tightly semi-enclosed luminaires. The lighting industry and the supporting standards entities have not defined these application measures either, despite the growing consumer consideration and adoption of LED lamps.

LED lamps are not unlike CFLs for their thermal limitations in application. Socket orientation and combined lamp wattage per enclosure represent two notable factors in which the technology can be life limited when compared to incandescent. Use of these lamps will be much higher in existing fixtures than new build/remodel projects where new luminaires may be rated for specific lamp power. Proposed Title 24 language does

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not require Edison fixtures to be rated for CFL or LED lamps, nor does existing UL Standards. Thus the consumer has no guidance.

The CLTC is in a unique position to work with manufacturers and utilities to determine general application guidelines and to produce consumer education. We feel that an EPIC Investment to that regard stands to be one of the most beneficial endeavors for the CEC to reach its goals.

We at Hinkley Lighting appreciate the opportunity to share our thoughts and offer our technical support to the proposed.

Sincerely,

MICHAEL KACHALA
DIRECTOR OF ENGINEERING

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