

WILLIAMS-SONOMA, INC.

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March 13, 2007

And Cape
Senior Vice President
Store Development

Gary Flamm
Lighting Program Lead
California Energy Commission
1516 Ninth Street, Mail Stop 25
Sacramento, CA 95814

Dear Mr. Flamm,

I wanted to write you to provide feedback on the energy code changes being considered. I am in charge of design and construction of all of our companies' stores which includes Williams-Sonoma, Williams-Sonoma Home, Pottery Barn, Pottery Barn Kids, Pottery Barn Teens, Pottery Barn Bed and Bath, and West Elm.

In general, I think most people would agree that we live a large part of our lives in built environments illuminated by electric light. As such, the well designed (or badly designed) illuminated environment affects every aspect of our lives, both physically and psychologically. In retail environments, customer satisfaction and comfort, employee retention/health and sales success are just a few of the human factors that are obviously affected directly by lighting. I could list many other factors.

I'm not sure that I agree that pushing connected load allowances ever downward are the answer to energy efficiency. One of the elements that has been slipping away from our view is energy use over time. What is important is if the lighting is off or reduced when it isn't needed. Right now, there has been a general removal of encouragement/incentives to include lighting controls in projects. Looking at alternate models for energy efficiency that consider kilowatt hours rather than connected load would seem to make a whole lot of sense.

What we don't want is to impose unhealthy, unpleasant or poorly productive illuminated spaces on the human environment. Forcing designed spaces into formulaic approaches with extremely limited solutions is not the answer. Beauty and joy can still be maintained while remaining responsible environmental citizens of the world. It is a balance and must be considered holistically. The advancement of technology moves in waves and is not always linear in its development. As such, these cycles need to be considered with the wisdom of time and should be applied intelligently. Professional lighting designers have been at the leading edge in utilizing new technologies time and time again and have learned that sometimes you end up on the bleeding edge. My own experience with this is too numerous to list in a letter.

Comments on the Title 24 Proposed Changes for 2008 on Specialty Retail

Criteria/Needs:

- Smaller stores with dense floor displays with multiple merchandise displays grouped together and ranging in height (not flat tables)
- Extensive wall display area – 1' to 7' high
- Wall and Floor displays are very close together
- Accent Lighting approach appropriate for merchandise and customer demographics
- No general lighting; pathway lighting is spill light or reflected light from display
- IESNA recommends at least 10:1 brightness ratios for accent
- Specialty lighting to support branding

Mr. Gary Flamm
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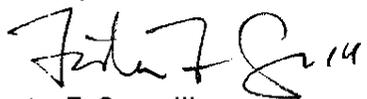
Comments on CASE Study for Indoor

- Cost of low wattage (20W) CMH track system is 5-8 times the cost of currently used track lighting system used with 37 watt MR16 Infrared lamps.
- For both new construction and remodel of existing stores, projects have been and may be cancelled if required to use CMH due to cost of systems with no payback during the life of the store. Regardless this places an undue financial hardship on the merchant.
- CMH systems with 39 watt lamps provide too much light per lamp to light wall displays – accessories, like lenses, are not desired for mall stores due to non-lighting (inexperienced?) maintenance personnel (retail staff provides maintenance and lenses get lost or may be installed incorrectly). Not a viable alternative.
- Appreciate the change to allow trade-offs between wall display and floor display
- Wall lighting model (see page 18 of case study) does not cover full area used for display
- Compact fluorescent wall washer solution (see page 20 of case study) provides light on wall surface above casework which will result in more light being required for recommended accent (contrast ratios). Typically upper wall surface is not lighted to allow greater accent with lower ambient light levels. So reduction of wattage to use this system results in not meeting the IESNA recommended ratios – not a viable alternative.
- The lighting quality of fluorescent lamps is not conducive to all types of merchandise. In particular, sharp edged and shiny materials (such as in a Williams-Sonoma store) suffer as object modeling is poor from the soft and diffused nature of fluorescent lamps. Due to color rendering properties, wood is not rendered particularly well nor are objects with a wide range of color within them. Mixing compact fluorescent with MR16 lamps will also produce an odd combination of color rendering of objects located adjacent to each other – not a good design choice.
- Reduction in floor display wattage does not accommodate the multiple table, multiple height displays that are typical of this type of retail layout. The models showing display area as flat tables is not consistent with actual displays. A great deal of floor display is vertical on the sides of free standing units. Reduced wattage allowances would not allow for accent light on all displays as recommended by the IESNA.
- Smaller stores cannot take advantage of the metal halide technology like large, high ceiling stores.
- LED's do not yet have enough light and good color rendering to be used except in special locations for color accent.
- Lighting technology has not improved enough in the last three years to justify this proposed reduction in display lighting.

Our brands already use energy efficient halogen sources at low wattages, T8 lighting with lamp/ballast systems to get further energy savings and occupancy sensors in offices and storage areas, and low voltage relay panels on automatic time clocks for store control.

I hope that the above comments are useful. Please feel free to call me if you have any questions.

Sincerely,



Foster F. Cope, III
Senior Vice President
Store Development