HINKLEY
LIGHTING

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Mr. Andrew McAllister
Commissioner
California Energy Commission
1516 Ninth Street
Sacramento, California 95814
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Hinkley Lighting Comments on Adoption of 15 Day Language of 2016 Energy Efficiency Building Standards

Dear Commissioner McAllister,

Thank you for the continuing opportunity to participate via comment in the development of Title 24 Standards. Hinkley Lighting would like to take this opportunity to recognize the progress made in the Product Standards content of the 15 Day Language, reiterate our concerns for the widespread adoption of LED Edison Lamps without further application testing, and point out a potential shortfall in the intended exemption of outdoor SSL-integrated luminaires from the JA10 appendix.

The 45 Day Language represented great improvement in many of the consumer perceived shortfalls of LED Lighting as it compares in features and ease of use to incandescent. Unfortunately it also dictated standards such as NEMA SSL-7A which is not the only method manufacturers have to improve dimming. Many of us continue to implement smarter drivers that emulate 7A, plus support additional compatibility. Making SSL-7A a check-box option for compliance, while yet requiring the luminaire performance otherwise explicitly, is the best path forward.

The 15 Day Language also has leveled the playing field between lamping and dedicated engine alternatives. Unfortunately there is an inequity in application of GU24 and Edison Base lamping which will serve to harm the adoption of lamping in those applications deemed best. Hinkley Lighting respectfully points out to the Commission that the thermal limitations of many luminaires with Edison sockets are identical to those with GU24 sockets. As such only a dedicated test of lamp in luminaire should be accepted by the Commission in the use of lamping. Requiring this of GU24 lamps but not Edison has no technically sound merit.

Hinkley has commented prior, in detail, to the Commission on the application of CFL and LED lamps to Residential Decorative Luminaires. Unless otherwise tested, fully enclosed lighting chambers should be limited to a single lamp, with of course a lamp rated for

such use. Partially enclosed lighting chambers without suitable vertical venting should also be limited to a single lamp. The acceptable wattage of that lamp and thus lumen output, at this point, depends both on the specific lamp design and the construction of the luminaire it is within. Failure to confirm lamp usage within a luminaire is most likely to result in premature lamp failure. Once deemed as an application failure by the luminaire manufacturer who did not test for LED lamp usage, the consumer will more often be lead to the replacement with an incandescent-type lamp. We note that recent final revisions to EPA ENERGY STAR Luminaires V 2.0 require the luminaire labelling of a specific replacement lamp. Without requiring specific luminaire listing, the CEC has regulated a condition of no guidance for the consumer.

Acknowledging the market currently does not direct consumers on the best application of CFL and LED lamping, and the stated intent of the CEC to allow testing of only LED Lamps in the 15 Day Language, we suggest with the voted adoption as written, the requirement for a project to educate consumers on the best application of energy saving lamping in decorative fixtures.

Lastly, with 150.0-A deeming Inseparable Luminaires that are installed outdoors as exempt from JA8 and assumedly JA10 appendices and subsequent certification, there remains concern for the human response from flicker in residential decorative wall lanterns which aid in navigation up and down entry stairs and door thresholds. The expert concern requiring the JA10 appendix otherwise should equally apply to this outdoor application.

Respectfully,

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DIRECTOR OF ENGINEERING