2016 CA Title 24 Adoption Hearing Testimony
June 10, 2015

15-BSTD-1

Thank you Mazi, Peter, and Commissioners. I am Michael Jouaneh with Lutron Electronics, the world leader in lighting controls. I urge the Commission to postpone adoption of the Joint Appendices to the Standard until we can resolve key technical issues with JA8.

The 15-day language added a clarification to the scope to now include LED drivers, even if the driver is not integral to the lamp or light bulb. This scope shift has called into question some technical issues that smart LED drivers will not be able to comply with, namely the start time threshold. This will eliminate key customer desired features for lighting such as fade-to-on.

The EPA's ENERGY STAR lamp specification has recognized this issue and has made the appropriate changes to the start time metric to allow for this advanced technology.

We strongly suggest that the Standard harmonize with the ENERGY STAR start time threshold and the Commission publish an interpretation of the start time test method to allow for the use of smart LED drivers and give customers the aesthetically pleasing lighting effects such as fade-to-on.

Thus, we strongly encourage the Commissioners hold off on adoption on JA8 until this issue can be resolved.

Please see our docketed comments to the 15-day language which provides more details.

Thank you.

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