



January 17, 2023

VIA efiling.energy.ca.gov

J. Andrew McAllister, Ph.D.
Commissioner
California Energy Commission
715 P Street
Sacramento, CA 95814

**RE: 2022 Appliance Efficiency Rulemaking for Repeal of Portable Luminaires Regulations
Docket Number 22-AAER-02**

Dear Commissioner McAllister:

These comments are submitted on behalf of the American Lighting Association's (ALA) members regarding the California Energy Commission's (CEC) proposal¹ to repeal regulations for portable luminaires.

ALA overwhelmingly supports the CEC's underlying proposal. ALA believes the common-sense proposal is thorough in its removal of associated definitions, marking requirements, testing mandates, certification obligations, and performance standards.

In 2020, ALA wrote to the CEC asking the Commission to consider eliminating the requirement that portable luminaires be packaged with qualifying lamps (bulb-in-the-box). At that time, ALA recognized that by eliminating the bulb-in-the-box requirements, new opportunities for manufacturers and showrooms were possible to increase sales, better serve California consumers and achieve greater energy savings. ALA also recognized that the only products available for sale in California were high-efficacious lighting, essentially making the portable luminaire regulations obsolete.

ALA is pleased that the CEC, after carefully studying the issue, came to the same conclusion. ALA agrees with the CEC's findings that the bulb-in-the-box regulations are burdensome, costly and out-of-date. There was a time when the portable luminaire regulations served a purpose, but now lamp efficiency and technology have moved on.

Price

ALA concurs with the CEC regarding the repeal's impact on price. From an ALA perspective, manufacturers are forced to inflate the price of portable luminaires because of the cost associated with sourcing, purchasing, certifying and packing suitable lamps. Eliminating the portable luminaire regulations will remove this burden thus lowering the base price of a fixture. The result will be an increase in sales.

¹ <https://www.energy.ca.gov/rules-and-regulations/appliance-efficiency-regulations-title-20/appliance-efficiency-proceedings-13>

Consumers

ALA also concurs with the CEC regarding the repeal's impact on consumers. Currently, consumers purchase a fixture that comes with a manufacturer included lamp. That fixture-to-lamp combination may not be ideal for every consumer. ALA's members believe there is a better way to serve customers. Moving forward with the repeal will allow for better customer service. ALA's showroom members are uniquely positioned to assess a consumer's needs and assist them to pair the right lamp with their intended use. The result will be a satisfied customer.

Regulatory Activity

There is a growing trend towards sunsetting efficiency requirements for light source products as government entities, other than the CEC, are also realizing that product efficiency levels are exceeding current standards. For example, the U.S. Environmental Protection Agency (EPA) proposed² to end the ENERGY STAR lighting program, citing similar reasons used by the CEC. ALA submitted comments supporting EPA's proposal. Furthermore, ALA is working with Congress on legislation to direct the Department of Energy to end the bulb-in-the-box requirement for ceiling fan light kits.

Conclusion

The time is right to repeal this regulation that has been on the books for nearly 15 years. ALA appreciates the CEC's consideration of these comments and looks forward to engaging with the CEC to finalize repealing the requirements for portable luminaires.

Respectfully submitted,



Michael Weems
Vice President, Government Engagement

About ALA

ALA represents over 1,200 member companies in the residential lighting, ceiling fan and controls industries in the United States, Canada, the Caribbean and Mexico. Member companies are manufacturers, manufacturers' representatives, retail showrooms and lighting designers.

American Lighting Association
2050 N. Stemmons Freeway, Unit 100
Dallas, TX 75207
(469) 778-7625
alalighting.com | alamembers.com

cc: Corrine Fishman, Regulations Manager, Efficiency Division
Carlos Baez, Appliances Branch, Efficiency Division

²

<https://www.energystar.gov/sites/default/files/asset/document/ENERGY%20STAR%20Lighting%20Sunset%20Proposal%20Memo.pdf>