



**KYLE PITSOR**

Vice President, Government Relations

November 6, 2017

Online via: <https://efiling.energy.ca.gov/Lists/DocketLog.aspx?docketnumber=17-AAER-15>

Mr. Patrick Saxton  
California Energy Commission  
Dockets Office, MS-4  
Re: Docket No. 17-AAER-15  
1516 Ninth Street  
Sacramento, CA 95814-5512

**NEMA Comments on CEC Title 20 45-Day Language Docket 17-AAER-15**

Dear Mr. Saxton,

As the leading trade association representing the manufacturers of electrical and medical imaging equipment, the National Electrical Manufacturers Association (NEMA) provides the attached comments on the draft proposals for California's Title 20 Appliance Energy Efficiency Regulations. These comments are submitted on behalf of NEMA Lighting Systems Division Member companies.

NEMA, founded in 1926 and headquartered in Arlington, Virginia, represents nearly 350 electrical and medical imaging manufacturers. Our combined industries account for more than 350,000 American jobs and more than 6,500 facilities across the U.S. Domestic production exceeds \$117 billion per year. Please find our detailed comments attached.

Our Member companies count on your careful consideration and we look forward to an outcome that meets their expectations. If you have any questions on these comments, please contact Alex Boesenberg of NEMA at 703-841-3268 or [alex.boesenberg@nema.org](mailto:alex.boesenberg@nema.org).

Sincerely,

A handwritten signature in black ink that reads "Kyle Pitsor". The signature is written in a cursive, flowing style.

Kyle Pitsor  
Vice President, Government Relations

## NEMA Comments on CEC Title 20 45-Day Language Docket 17-AAER-15

1. New Exception 5. To Section 1606(a)(3)(C): NEMA recommends the addition of clarifying text at the end of this new exception paragraph. Our suggested addition is shown below in **bold**.

“Manufacturers shall update the certification in the database upon completion of the required test procedures for rated lifetime **according to Appendix BB of 10 CFR 430 Subpart B .**”

  - a. We note that the 45-day language did not include changes to Title 20 Appendix X submission template for LED lamps. When this template is issued, it should allow for the submission of estimated lifetime results.
2. New Exception 5. To Section 1606(a)(3)(C): the middle of this new passage includes the words “the certification report shall describe the prediction method, which must use statistical projections consistent with the methods specified in 10 C.F.R. section 430.23(ee)”. It is the position of the Members of the NEMA Light Source Section that testing and lifetime projection using IES Standards LM-80 and TM-21 is “consistent with” the requirements of 10 CFR 430.23ee and Appendix BB. NEMA members intend to use these methods, in addition to those in IES LM-84 and TM-28 (from the DOE Test Procedure for LED Lamps) as their situation dictates.
3. Although the 45 day language uses the term ‘rated life’, for the purposes of certification, we interpret this term to mean the same as ‘time to failure’ in 10 CFR 430.