



Ministry of
Energy and Mines

California Energy Commission

DOCKETED

14-AAER-01

TN 73862

OCT 24 2014

October 24th, 2014

California Energy Commission
Dockets Office, MS-4
Re: Docket No. 14-AAER-1
1516 Ninth Street
Sacramento, CA 95814-5512

ATTN: Mr. Harinder Singh and Mr. Ken Rider

Re: Proposed Rulemaking of Small Diameter Directional Lamps (SDDL) and Light Emitting Diode (LED) Lamp Efficiency

Dear Sirs,

Staff at the British Columbia Ministry of Energy and Mines (MEM) appreciate the opportunity to submit a formal comment regarding the CEC's proposed rulemaking on SDDL and LED efficiency. For a number of years, this product category has been of interest to MEM.

As members of the Pacific Coast Collaborative (PCC), MEM staff work closely with the CEC's staff engineers on advancing leading edge codes and standards where technologically and economically feasible. Our jurisdictions have fostered a very productive partnership that continues to yield important information exchange.

MEM staff have analyzed the CEC staff proposal published in September 2014 in some detail, and believe it to be reasonable and accurate. MEM staff will propose to consult on a similar standard for B.C. in 2015.

The latest data available in B.C. from 2011, suggests that of all the MR16-type bulbs sold, LEDs accounted for approximately 4% market share. Additionally, a recent shelf study concluded that the average price of LED MR-type bulbs have decreased in cost by 26% from \$22.85 in 2010 to \$16.87 in 2013. Our largest electric utility, BC Hydro, continues to offer LED point of retail purchase rebates for one month in the spring and fall of every year. Similar incentives are available to commercial property owners and operators.

MEM staff expect that through these rebates and generally declining prices, as outlined in the CEC staff report, the market share of LED MR16s will continue to trend upwards. B.C. market share data from 2012 and 2013 will become available shortly to further substantiate these projections. Given that the CEC's proposed effective date is January 1st, 2018, we believe the lead time is adequate to allow for consumer acceptance of this lighting technology.

MEM staff believe the CEC's approach to addressing LED light quality is sound. The trade-off allowance between CRI and efficacy is a good solution to allow manufacturers the flexibility to develop new product technology while maintaining minimum user acceptability. The proposed incandescent equivalency ratings are important for consumers as they transition to this new

**Ministry of Energy and
Mines**

Electricity and Alternative
Energy Division

Mailing Address:
PO Box 9314 Stn Prov Govt
Victoria, BC V8W 9N1
Facsimile: (250) 952-0258

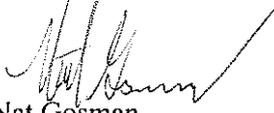
Location:
4th Flr. - 1810 Blanshard Street
Victoria, BC V8W 9N1

Website: www.gov.bc.ca/empr

technology. Problems with dimmability have been prevalent with this product class, so it is important that the CEC outlined minimum performance standards for this function as well.

MEM staff support this proposal to and look forward to continued collaboration with the CEC.

Yours sincerely,

A handwritten signature in black ink, appearing to read 'Nat Gosman', with a long, sweeping flourish extending to the right.

Nat Gosman
Director, Energy Efficiency Policy
Electricity and Alternative Energy
Ministry of Energy and Mines
(250) 952-0204