

**Appliance Standards Awareness Project**  
**American Council for an Energy Efficient Economy**  
**Alliance to Save Energy**  
**Northeast Energy Efficiency Partnerships**  
**Northwest Energy Efficiency Alliance**

October 7, 2019

Mr. Patrick Saxton  
Appliances Office  
California Energy Commission  
1516 Ninth Street, MS-25  
Sacramento, CA 95814-5512

Docket Number: 19-AAER-04  
TN Number: 229530

Dear Mr. Saxton:

Appliance Standards Awareness Project, American Council for an Energy Efficient Economy, Alliance to Save Energy, Northeast Energy Efficiency Partnerships, and Northwest Energy Efficiency Alliance commend the California Energy Commission for expanding the scope of California's general service lamp regulations. This action will broaden the types of light bulbs that are subject to California's existing general service lamp (GSL) standards, resulting in significant reductions in the electricity consumed by lighting and in significant utility bill savings for California consumers and businesses. CEC's staff report estimates that expanding the scope of California's existing minimum energy efficiency standards for GSL will save over 13,600 gigawatt-hours of electricity annually after the existing stock of inefficient light bulbs fully turns over. This equates to over \$2.4 billion in annual savings for California electric utility customers.

By taking this action the California Energy Commission harmonizes California's GSL standards with state GSL standards in Vermont, Colorado, Washington, Nevada and with two final GSL definition rules published by the U.S. Department of Energy on January 19, 2017. We believe that DOE's 2017 Final Rules were properly finalized and that DOE's recent actions to withdraw them are illegal. ASAP also recognizes that by making the amended definition effective for general service lamps *sold* on or after January 1, 2020 that the CEC is departing from its usual practice to further align California regulations with regulations in the above states and with federal GSL standards.

We thank the CEC for taking this action to broaden the impact of California's general service lamp standards, and for the the opportunity to submit these comments.

Sincerely,



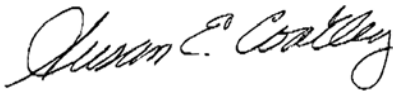
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