California Energy Commission
DOCKETED
15-BSTD-01
TN # 75897
JUN 08 2015

Dockets #15-BSTD-01 and #15-CALG-01

California Title 24 15-day language

June 8, 2015

To whom it may concern:

Progress Lighting respectfully requests the Board reconsider the changes in Title 24 with respect to controlling outdoor lighting in residential applications [Section 150.0(k)3] Specifically, the new requirement that the luminaire be controlled by a photocell is problematic. Below are some images from lamps readily available in the market. The warnings of incompatibility are typical and not unique to any specific brand. The problem arises largely from two sources (1) inability of photocells to distinguish environmental light from artificial light and (2) cycling caused by #1 which in turn causes premature lamp/ballast failure.

To further explain point 1, it must be understood that for "decorative" fixtures that are commonly used for residential applications, it can be difficult to position the photocell to avoid exposure to indirect lighting caused by reflections off adjacent surfaces. The photocell cannot distinguish between this reflected artificial light and actual environmental ambient light. Because of the widespread complaints from photocells, EPA removed photocells as a requirement with the release of the v1.0 standard in 2013.

Regards,

David Peek, Product Manager

ENERGY SAVING/**3000K**

MLS13GU30

GU24 SpiraMax

LIMITED WARRANTY:
3 Year warranty from date of purchase. Suitable for damp locations. Reliable operating temperature is -10°F ~ 140°F. Do not use with dimmers, timers, and other control devices. Manufactured in China under license from MaxLite, USA. This product complies with part 18 of FCC rules, but may cause interference with radios, televisions, wireless telephones and remote controls.
If interference occurs, move the product away from the device or plug into a different outlet. This class [B] RFLD complies with the Canadian standard ICES-005.

1000 819 945

ecosmart™

120 volts | 14 watts | 5000 K

Lighting Facts Per Bulb

Brightness	850 lumens
Estimated Yearly Energy Cost	$1.69
Based on 3 hrs/day, 11¢/kWh	
Cost depends on rates and use	
Life	
Based on 3 hrs/day	18.2 years
Light Appearance	
Warm — Cool	
5000 K	
Energy Used	14 watts

Contains Mercury
For more on clean up and safe disposal, visit epa.gov/cfl.

LAMP CONTAINS MERCURY:
Manage according to Local, State, or Federal Disposal Laws.
See: www.lamprecycle.org or call 1-800-378-6998

Minimum starting temperature: -20F (-28.9°C).

This device complies with Part 18 of the FCC rules. If interference occurs move this product away from the device or plug into a different outlet. This product may cause interference with [illegible] operating between 0.45-30MHz.

ENCLOSED FIXTURE REQUIRED FOR OUTDOOR USE. THIS DEVICE IS NOT INTENDED FOR USE WITH EMERGENCY EXIT LUMINAIRES OR EMERGENCY EXIT LIGHTS, PHOTOCONTROLS, ELECTRIC TIMERS OR DIMMERS.

3 YEAR LIMITED WARRANTY: Return of defective products required for warranty claims. Duration of Limited Warranty based on average daily use of 3 hours. Limited Warranty voided [illegible] 1-800-378-6998.

† This 14 watt Compact Fluorescent bulb provides light similar to a 60 watt A19 Incandescent bulb while generating less heat

* based on 3 hours average use per day

** based on 11 cents per kilowatt hour as compared to a halogen bulb

Feit

CAUTION

Use only on 120 volts 60Hz circuits. Not for use where directly exposed to the weather. Starting temperature -20°F. Optimum operating temperature -10°F to 140°F. This device is not intended for use with emergency exit fixtures or emergency exit lights. Do not use with dimmers, photocontrols or electronic timers. Never use more than 25 lamps per 20 amp branch circuit. This product complies with Part 18 of FCC rules, but may cause interference with radios, televisions, wireless telephones and remote controls. If interference occurs, move the product away from the device or plug into a different outlet. This class [B] RFLD complies with the Canadian standard ICES-005.