

October 7, 2019

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

Re: Notice of Proposed Action: General Service Lamps Appliance Efficiency Rulemaking
Docket Number: 19-AAER-04; TN Number: 229530

Dear Mr. Saxton:

Consumer Federation of America¹ (CFA), Consumer Action², Consumer Reports³ and Consumer Federation of California⁴ are writing in support of the California Energy Commission's Notice of Proposed Action relating to the General Service Lamps Appliance Efficiency Rulemaking (Docket 19-AAER-04). California has long been at the forefront in energy efficiency, and we urge the California Energy Commission (CEC) to continue to exert its strong leadership by approving the proposed action to adopt the 2017 Final Rules pertaining to general service lamps (GSL), general service incandescent lamps (GSIL), and other supplemental lamp types issued by the U. S. Department of Energy (DOE) on January 19, 2017.

This step by the Commission will benefit California consumers and businesses, and we believe California has the right to do so in spite of actions taken by DOE on September 5, 2019 to weaken the lighting standards that were adopted on January 19, 2017.

These rules, which will result in more efficient lighting products being sold in California, are a perfect example of a highly beneficial standards. While individual pocketbook savings are small, the aggregated cost savings are large and the impact is important. Over the past decade, we have managed to increase the amount of light in our lives with declining electricity consumption and bills.

The CEC's Notice of Proposed Action will save California consumers and businesses between \$736 million and \$2.4 billion in annual savings after existing stock fully turns over,

¹ Consumer Federation of America is a federation of over 250 national, state and local organizations that was established in 1968 to advance the consumer interest through advocacy, research and education.

² Consumer Action (based in San Francisco, CA) has been a champion of underrepresented consumers nationwide since 1971. A non-profit 501(c)(3) organization, Consumer Action focuses on consumer education that empowers low- and moderate-income and limited-English-speaking consumers to financially prosper. It also advocates for consumers in the media and before lawmakers to advance consumer rights and promote industry-wide change.

³ Consumer Reports is an independent, nonprofit membership organization that works side by side with consumers to create a fairer, safer, and healthier world. For more than 80 years, CR has provided evidence-based product testing and ratings, rigorous research, hard-hitting investigative journalism, public education, and steadfast policy action on behalf of consumers' interests.

⁴ Since 1960, the non-profit Consumer Federation of California has served as a leading advocate for consumer rights. CFC has championed consumer protection laws and regulations, including utility rate regulations and energy conservation measures.

while also benefitting the environment. And, there are also broader economic benefits from the 2017 Final Rules when the commercial and industrial sectors save on lighting costs. These energy savings can be passed on to consumers in the form of lower costs for goods and services and can be spent in other areas in California's economy with greater multiplier effects.

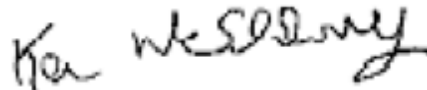
In closing, representing national and California consumer organizations, we hope the Commission will move with all due speed and approve its proposed action to adopt the January 19, 2017 Federal Rules for general service lamps (GSL), general service incandescent lamps (GSIL), and other supplemental lamp types—the CEC's approval will benefit Californians and serve as a beacon for the rest of the country.

Thank you for your consideration.

Respectfully submitted,



Mel Hall-Crawford
Energy Projects Director
Consumer Federation of America
melhc@consumerfed.org
805-245-0523



Ken McEldowney
Executive Director
Consumer Action
ken.mcelandey@consumer-action.org
415-777-9648



Shannon Baker-Branstetter
Manager, Cars & Energy Policy
Consumer Reports
sbaker-branstetter@consumer.org
202-462-6262



Richard Holober
Executive Director
Consumer Federation of California
holober@consumercal.org
(415) 597-5710