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San Francisco, California 94126**

October 7, 2019

California Energy Commission
1516 9th Street, MS-4
Re: Docket No. 19-AAER-04
Sacramento, CA 95814
docket@energy.ca.gov

Re: Docket Number 19-AAER-04

Dear California Energy Commission Staff:

The California Association of Ratepayers for Energy Savings (CARES) is a California nonprofit association comprised of California energy ratepayers who are dedicated to affordable and sustainable energy, and a healthier environment for all Californians. CARES submits the following comments to the California Energy Commission's (CEC) Notice of Proposed Action (NOPA) to amend the regulations for general service lamps (GSLs) to align with federal law as stated in Docket No. 19-AAER-04.

In short, CARES strongly supports the CEC's proposed GSL expansion as a formidable and common sense step to increase energy efficiency and lower consumer energy costs and, in turn, create substantial environmental benefits. We support the incorporation of the expanded federal GSL definitions published on January 19, 2017, and the 45 lumen-per-watt efficacy standard for GSLs, as well as the alignment of California's test procedures with DOE's new and updated test procedures. This alignment of California regulations with federal law provides the means to decrease consumers' electricity bills, while simultaneously increasing energy efficiency and lowering environmental impacts.

The updated definitions and test standards in the NOPA provide critical opportunity for California's promise to reduce global warming pollution. By ensuring that increased efficiency standards and updated test procedures for GSLs are enforced on the broader scope of products covered by the definitional rules, the CEC creates markets for energy efficient GSLs, thereby conferring tangible consumer and energy savings. As described in the NOPA, the changes will conserve up to 13,600 gigawatt-hours of electricity per year in California, saving consumers up to \$2.4 billion in annual electricity costs, equal to nearly ***\$210 per household per year***.

Not only is the CEC's NOPA beneficial to California ratepayers' wallets, but it will also appreciably reduce Californians' energy use. Consider the lost energy savings to California ratepayers if CEC does not finalize this rulemaking:

- If the CEC standard effective date is delayed by one year, an average Californian household loses out on **201 kWh** savings in the first year of operation alone.
- If the CEC standard effective date is delayed by two years, an average Californian household loses out on **384 kWh** savings in the first year of operation alone.
- So, if the CEC standard is not effective until January 1, 2022, an average Californian household loses out on **585 kWh** of savings in the prior two years.
- Starting in 2025 and every year onward, an average Californian household loses out on **757 kWh** per year of savings.

In the first two years of operation, an average California household will save over a month's worth of energy per year simply by CEC's expanding its GSL definitions and standards to be co-extensive with the Obama-era definitions and standards. This reduction in energy use is vitally important to reducing greenhouse gas emissions and, therefore, an imperative step in the CEC's mission to promote and achieve energy efficiency and a healthier environment for all Californians.

The CEC's ability to expand the GSL definitions and standards to be co-extensive with federal standards is sacrosanct. Congress has time-and-time again recognized California's leading role in energy efficiency for decades and provided express statutory exceptions to preemption for California to operate at the forefront of the country with progressive energy policies. The Energy Independence and Security Act of 2007 ("EISA") provides California with a preemption exception that permits California to adopt regulations relating to GSLs starting January 1, 2018.¹ Accordingly, CEC can, and should, use the authority granted to it by Congress to amend its GSL definitions to align with DOE's Obama-era expanded definitions. Such a rulemaking by CEC fits within the exception permitting California to be the first to require higher GSL energy efficiency.

CEC can, and should, disregard the pending Trump-era DOE's rollback of these definitions and standards as an unlawful corporate handout and environmentally disastrous energy policy. DOE has never had the authority or discretion to weaken energy efficiency standards. CEC must disregard the Trump-era administration's unlawful assault on energy independence and continue to lead the charge to California's clean energy future. All Californians stand to gain significant financial and environmental relief from CEC taking this next logical and progressive step forward on GSLs.

¹ 42 U.S.C. § 6295(i)(6)(A)(vi) [California preemption exception]; § 6291(30)(BB) [General service lamp definition].

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We appreciate the opportunity to comment on this important matter. We hope the Commission will take this necessary step to expand its GSL definitions and standards to ensure the protection of California consumers and the environment at large.

Respectfully,

Members of the California Association of
Ratepayers for Energy Savings