



March 21, 2018

Senator Christopher Bray, Chair
Senate Energy and Natural Resources Committee
115 State Street
Montpelier, VT 05633

H.410 – Comments from Philips Lighting

Chair Bray and Members of the Senate Energy and Natural Resources Committee:

Today we are writing in opposition to H.410.

Philips Lighting is a global lighting leader with a strong legacy of being committed to energy efficiency and while we operate at net zero in the US, the company is on a path to becoming 100% carbon neutral globally by 2020. We are proud to be the first company to have delivered its one billionth LED product as part of the Global LED Lighting Challenge, marking the halfway point to our goal of delivering two billion LED light points by 2020.

As strong proponents of energy efficiency, we applaud the work done by the Appliance Standards Awareness Project on behalf of consumers to increase energy efficiency.

As background, the Department of Energy (DOE) exempts high color rendering fluorescent lamps, i.e., lamps that have a metric known as the color rendering index (CRI) which is 87 or greater, from federal regulation because at the time the regulations were created, the high CRI lamps could not meet the efficacy requirements in place.

The linear fluorescent market is rapidly shrinking year after year, according to data from the National Electrical Manufacturers Association (NEMA). One type of high CRI fluorescent lamp, the T12 (which is a long tube with a diameter of 1 ½ inches), cannot meet the current efficacy limits established by the DOE. To be clear, in terms of lamp design, achieving those efficacy levels is not technically possible. This bill doesn't just raise the bar but would have the effect of banning this fluorescent product in Vermont altogether. Moreover, an unintended consequence of this provision would be a loss of jobs as the majority of high CRI T12 fluorescent products are manufactured in the United States.



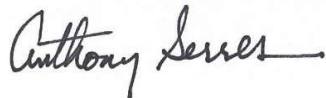
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If T12 lamps are no longer available for purchase in Vermont, a consumer may try to substitute a different type of fluorescent lamp, known as a T8 (which has a diameter of 1 inch). If you think of a basic screw-in household light bulb, swapping out an incandescent bulb for an LED is a seamless exercise. Fluorescent lamps, however, are matched to a device called a ballast which actually operates the lamp at a specific electric voltage and current. A T8 lamp probably will not operate correctly on a T12 ballast creating customer dissatisfaction. The typical consumer likely would be forced to incur significant cost to hire an electrician and replace either the ballast or the entire lighting fixture. Those who are more inclined to do things themselves may look to a tubular LED replacement (TLED) lamp. While these are available in the market, very few will actually operate reliably on the ballasts typically found in residential applications.

Perhaps more effective than regulating high CRI fluorescent lamps would be to provide additional incentives for the ubiquitous adoption of LED lighting.

We would be pleased to work with the sponsors and the entire Committee to make modifications to this bill. Thank you for the opportunity to participate in today's hearing; we look forward to working with you to develop solutions that satisfy our mutual goals.

Sincerely,

A handwritten signature in black ink that reads "Anthony Serres". The signature is written in a cursive style with a horizontal line at the end.

Anthony W. Serres, LC
Manager, Technical Policy
Philips Lighting

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