

June 26, 2020

Robin Yochum
Program Manager
Nevada Governor's Office of Energy
755 N. Roop Street, Suite 202
Carson City, NV 89701

Re: Joint Proposal for Nevada General Service Lamp Energy Efficiency Standards

Dear Ms. Yochum,

On behalf of the Nevada Resort Association (NRA), Nevada Conservation League (NCL), and the Natural Resources Defense Council (NRDC) we jointly submit the attached mark-up of the Office of Energy's draft lighting standards that were issued on September 3, 2019 for its consideration. The recommended changes are supported by each of the signatories and provide some minor modifications to the agency's proposed definition of general service lamps.

Background: Assembly Bill 54 (AB54) was signed into law on May 27, 2019 and set minimum energy efficiency requirements for general service lamps (e.g. everyday light bulbs). Adoption and implementation of the law are important for Nevada residents and businesses as the annual benefits in 2025, according to a 2019 analysis by the Appliance Standards Awareness Project, include:

- Statewide electricity savings of more than \$85 million,
- Average household electricity bill savings of \$80 dollars, and
- Reduction of global warming CO2 emissions of 280,000 metric tons, which is equal to a year's emissions from 60,000 gas-powered cars

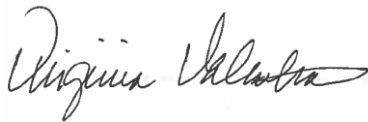
AB54 directed the Director of the Office of Energy to define by regulation the term general service lamp (GSL). A draft definition for GSLs was issued by the agency in its proposed regulations on September 3, 2019. On behalf of its members, the NRA sought to exempt commercial lighting products from the regulations due to their concerns about the performance or availability of compliant lamps for certain niche applications, as indicated in their comments dated October 21, 2019.

After extensive discussions between technical experts from the NRA and NRDC, and the participation of environmental advocates representing the Nevada Conservation League, consensus was reached on a limited set of products that would be added to the list of exemptions in the regulations. Each of these newly exempted products represent niche products used in the hospitality and casino industry, which have very low sales

volumes and energy use. These exemptions were carefully worded to ensure these products don't create a loophole from the regulations and won't result in broader usage of these products.

In closing, we urge the Office of Energy to incorporate the suggested changes to Section 2 of its proposed regulation as provided in Attachment 1 and to expeditiously adopt and implement these important, common sense energy efficiency standards.

Sincerely,



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cc: David Bobzien, Director, Governor's Office of Energy

Attachment 1

PROPOSED REGULATION FOR THE OFFICE OF ENERGY

Lighting Standards

NRS 701.260

Chapter 701 of NAC is hereby amended by adding thereto the provisions set forth as sections 1 and 2, inclusive, of this regulation.

Section 1.

ON AND AFTER JANUARY 1, 2020, NO GENERAL SERVICE LAMP MAY BE SOLD IN THIS STATE UNLESS IT MEETS OR EXCEEDS THE MINIMUM STANDARD OF ENERGY EFFICIENCY FOR LUMENS PER WATT OF ELECTRICITY CONSUMED THAT MUST BE PRODUCED BY GENERAL SERVICE LAMPS PURSUANT TO NRS 701.260. THE MINIMUM STANDARD OF ENERGY EFFICIENCY FOR GENERAL SERVICE LAMPS IS 45 LUMENS PER WATT OF ELECTRICITY CONSUMED.

Section 2.

GENERAL SERVICE LAMP MEANS:

(A) A LAMP THAT:

(1) HAS A MEDIUM, CANDELABRA OR INTERMEDIATE SCREW BASE ~~BASE THAT COMPLIES WITH ANSI STANDARDS~~; (2) IS ABLE TO OPERATE AT A VOLTAGE:

(I) OF TWELVE OR TWENTY-FOUR VOLTS;

(II) AT OR BETWEEN ONE HUNDRED AND ONE HUNDRED THIRTY VOLTS;

(III) AT OR BETWEEN TWO HUNDRED TWENTY AND TWO HUNDRED FORTY VOLTS; OR

(IV) OF TWO HUNDRED SEVENTY-SEVEN VOLTS FOR INTEGRATED LAMPS OR ANY VOLTAGE FOR NONINTEGRATED LAMPS;

(3) HAS AN INITIAL LUMEN OUTPUT GREATER THAN OR EQUAL TO THREE HUNDRED TEN LUMENS, OR TWO HUNDRED THIRTY-TWO LUMENS FOR MODIFIED SPECTRUM GENERAL SERVICE INCANDESCENT LAMPS, AND LESS THAN OR EQUAL TO THREE THOUSAND THREE HUNDRED LUMENS;

(4) IS NOT A LIGHT FIXTURE OR AN LED DOWNLIGHT RETROFIT KIT; AND

(5) IS USED IN GENERAL LIGHTING APPLICATIONS;

(b) INCLUDES, **BUT IS NOT LIMITED TO**, GENERAL SERVICE INCANDESCENT LAMPS, COMPACT FLUORESCENT LAMPS, ~~AND~~ GENERAL SERVICE LED LAMPS, GENERAL SERVICE ORGANIC LED LAMPS, **AND REFLECTOR LAMPS**;

One would incorporate by reference DOE definitions for the various terms used.

(c) DOES NOT INCLUDE:

(1) APPLIANCE LAMPS;

(2) **B-SHAPE LAMPS WITH A DIAMETER OF 1.25 INCHES AS DEFINED IN ANSI C79.1-2002 AND A CANDELABRA SCREW BASE THAT CONSUME \leq 40 WATTS. THIS EXEMPTION EXPIRES ON DECEMBER 31, 2022.**

(2) BLACK LIGHT LAMPS;

(3) BUG LAMPS;

(4) COLORED LAMPS;

(5) G-SHAPE LAMPS WITH A DIAMETER OF FIVE INCHES OR MORE AS DEFINED IN ANSI C79.1-2002;

(6) GENERAL SERVICE FLUORESCENT LAMPS;

(7) **GERMICIDAL ULTRAVIOLET LAMPS (GUV)**

(8) HIGH- INTENSITY DISCHARGE LAMPS;

(9) INFRARED LAMPS;

(10) J, JC, JCD, JCS, JCV, JCX, JD, JS, AND JT-SHAPE LAMPS THAT DO NOT HAVE EDISON SCREW BASES;

(11) LAMPS THAT HAVE A WEDGE BASE OR PREFOCUS BASE

(12) LEFT-HAND THREAD LAMPS;

(13) MARINE LAMPS;

(14) MARINE SIGNAL SERVICE LAMPS;

(15) MINE SERVICE LAMPS;

(16) MR-SHAPE LAMPS THAT:

Commented [VP1]: This term would be defined as: Germicidal ultraviolet (GUV) lamps, where a GUV lamp is a lamp that is designed and marketed as germicidal lamp and is an ultraviolet lamp with the highest radiant power peaks in the UV-C band (200 to 280 nm) of the electromagnetic spectrum

- (a) HAVE A FIRST NUMBER SYMBOL EQUAL TO SIXTEEN (DIAMETER EQUAL TO TWO INCHES), AS DEFINED IN ANSI C79.1-2002;
- (b) OPERATE AT TWELVE VOLTS; AND
- (c) HAVE A LUMEN OUTPUT GREATER THAN OR EQUAL TO EIGHT HUNDRED;
- (17) OTHER FLUORESCENT LAMPS;
- (18) PLANT LIGHT LAMPS;
- (19) R20 SHORT LAMPS;
- (20) REFLECTOR LAMPS THAT HAVE A FIRST NUMBER SYMBOL LESS THAN SIXTEEN (DIAMETER LESS THAN TWO INCHES) AS DEFINED IN ANSI C79.1-2002 AND THAT DO NOT HAVE E26/E24, E26d, E26/50X39, E26/53X39, E29/28, E29/53X39, E39, E39d, EP39, OR EX39 BASES;
- (21) S-SHAPE OR G-SHAPE LAMPS THAT HAVE A FIRST NUMBER SYMBOL LESS THAN OR EQUAL TO TWELVE AND ONE-HALF (DIAMETER LESS THAN OR EQUAL TO 1.5625 INCHES) AS DEFINED IN ANSI C79.1-2002;
- (22) SIGN SERVICE LAMPS;
- (23) SILVER BOWL LAMPS;
- (24) SHOWCASE LAMPS;
- (25) SPECIALTY MR LAMPS;
- (26) T-SHAPE LAMPS THAT:
- (I) HAVE A FIRST NUMBER SYMBOL LESS THAN OR EQUAL TO ~~TEN EIGHT~~ (DIAMETER LESS THAN OR EQUAL TO ONE AND ONE QUARTER INCH), AS DEFINED IN ANSI C79.1-2002;
- (II) CONSUME ≤ 40 WATTS
- (III) HAVE A NOMINAL OVERALL LENGTH LESS THAN TWELVE INCHES; AND
- (IV) ARE NOT COMPACT FLUORESCENT LAMPS.
- THIS EXEMPTION EXPIRES ON DECEMBER 31, 2022;**
- OR
- (27) TRAFFIC SIGNAL LAMPS.