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October 8, 2019

DECISION MEMORANDUM

TO: Council Members

FROM: Kevin Smit, Senior Analyst; John Shurts, General Counsel; Andrea Goodwin, Senior Counsel

SUBJECT: Approval of Council response to the Department of Energy's (DOE) Notice of Proposed Determination (NOPD) regarding General Service Incandescent Lamps (GSILs).

PROPOSED ACTION: Approve Council comments to DOE regarding the general service incandescent lamps NOPD.

SIGNIFICANCE: Federal standards has been a key delivery mechanism for cost-effective energy savings in the Northwest, which have been an important (and low cost) component in meeting efficiency goals. DOE's proposed rule would have a significant impact on energy savings (160 aMW) and our EE planning assumptions.

BUDGETARY/ECONOMIC IMPACTS

None.

BACKGROUND

On September 5, 2019, DOE issued a Notice of Proposed Determination (NOPD) and request for comment regarding general service incandescent lamps (GSIL). In this NOPD, DOE determines that energy conservation standards do not need to be amended for incandescent lamps. In doing so, DOE separates GSILs from other general service lamps, which, in effect, limits the available technology alternatives that may be evaluated for efficiency in this NOPD to incandescent. Since there are no commercially available incandescent technologies that meet the 45 lumens/watt

standard, DOE determines that the current standards for GSILs do not need to be amended because a more stringent standard is not economically justified. However, under the regulations, general service lamps are defined to include GSILs, and, yet per this NOPD DOE has determined that the higher efficiencies available from general service CFL or LED lamps are not relevant to the standard for incandescent bulbs. The overall direct impact to the Northwest is approximately 160 aMW that would no longer be captured by the standard. Efforts to capture those savings would be shifted back into utility programs and thus result in higher cost and less equitable distribution of the savings. This proposed determination is causing significant confusion among utilities and regional EE organizations who are wondering if lighting programs should be re-started. The results of this determination also create significant uncertainty throughout the supply chain including manufacturers, distributors, retailers, and utility EE program operators.

Power and legal staff together prepared draft comments on the NOPD, and staff circulated those comments to Council members via email. As detailed in the comments, staff does not support DOE's proposal. Public comment on the NOPD closes November 4, 2019.