



February 27, 2020

Submitted via e-mail: ETTESTIMONY@CGA.CT.GOV

Sen. Norman Needleman, Chair
Rep. David Arconti, Chair
Joint Committee Energy and Technology
Connecticut General Assembly
Legislative Office Building, Room 3900
Hartford, CT 06106

RE: SB 178

Dear Chairs Needleman and Arconti and members of the joint committee:

Signify (formerly Philips Lighting) appreciates the opportunity to comment on SB 178.

Signify is a global leader in lighting products, systems and services. Our understanding of how lighting positively affects people coupled with our deep technological know-how enable us to deliver digital lighting innovations that unlock new business value, deliver rich user experiences and help to improve lives. Serving professional and consumer markets, we sell more energy efficient LED lighting than any other company. We lead the industry in connected lighting systems and services, leveraging the Internet of Things to take light beyond illumination and transform homes, buildings and urban spaces.

When it comes to energy efficiency, Signify “walks the talk”. We set ourselves the world-leading target to deliver more than 2 billion LED lamps and luminaires by 2020 and currently we have exceeded this with over 2.3 billion products introduced to the market. More than a year ago, our U.S. operations achieved carbon neutrality and all the company’s operations will be net zero carbon by the end of this year. Worldwide, 92% of our electricity use comes from renewable sources, over 82% of our revenues are from the sales of sustainable products and we were recently named industry leader by the 2019 Dow Jones Sustainability Index (DJSI) for the third consecutive year.

Please contact me if you have any questions.

Sincerely,

A handwritten signature in black ink that reads 'Anthony Serres'.

Anthony W. Serres, LC
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Signify North America Corporation

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Signify Testimony on CT Senate Bill 178 Energy & Technology Committee

February 27, 2020

Thank you for the opportunity to provide written testimony about Senate Bill 178.

We oppose the inclusion of the following products in this bill: Cold-temperature fluorescent lamps, General Service Lamps, and Impact-resistant fluorescent lamps. The bill would effectively ban incandescent/halogen lamps from the Connecticut market. We offer the following comments in opposition to the bill.

Cold-Temperature fluorescent lamps as defined in the bill must start at -20F. Any tubular LED replacement lamp would need to do the same to have the same utility for the customer. Most tubular LED replacement lamps on the market currently are designed to reliably start to -4F. Reliable starting to -20F cannot be guaranteed without a product redesign which is an additional burden on manufacturers.

At line 779 in the bill, it says that 180 days after the effective date of the section that the commissioner and Attorney General determine if the regulation of any general service lamp is subject to federal preemption. *We strongly suggest that you look at this now*, before the bill leaves your committee. Connecticut, and all other states, are already preempted from regulating general service lamps. From the DOE at 84 FR 46669: “Therefore, all states, including California and Nevada, are prohibited from adopting energy conservation standards for GSLs.” We ask that you strike the definition of general service lamps and their corresponding efficacy standard from the bill.

Regarding impact resistant lamps, tubular LED products are not inherently more impact resistant than linear fluorescent products. This is a common misconception. Many tubular LED products are now constructed of glass rather than plastic and are just as fragile as a typical linear fluorescent lamp. Consequently it is incorrect to assert that tubular LED lamps offer the same customer utility as impact-resistant fluorescent lamps. In addition, compliance to NSF/ANSI 51 is not common in the market for tubular LED lamps. The volume for impact resistant linear lamps is also very low, thus the potential energy savings is also very low.