CPUC Comments on **SWLG009-02 LED Tube – Type A**

Lead PA: **SCE**

Workpaper Submittal Date: **06/11/2020**

CPUC Review Date: **06/15/2020**

If you do not have any questions or concerns with these modifications noted in the table below, please revise the workpaper and upload the entire package to the WPA at your earliest convenience.  If you have questions or concerns about any of these items, please reach out to Deemed Review Team to set up a call to discuss.

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| CPUC Comment | PA Response |
| On page 2 in the Technical Summary, the term "retrofitted" is used when we believe "relamped" is intended.  Please change to "relamped" to avoid confusion | Update made to language. |
| The figure on page 2 shows lamps labeled as "LED or Fluorescent Tube" but since this figure is specifically referencing UL Type A TLEDs, please change this label to "LED Tube." | Updated figure label to say LED TUBE. |
| On page 8, in the eligibility requirements, the workpaper states that TLED lamp specifications sheets must list all compatible ballast models. While this implies that TLEDs must only be placed on ballasts that appear on these compatible ballast lists, this has not been explicitly stated. Please modify the workpaper in one of two ways:    a) If the intent is to only allow TLEDs to be used on ballasts listed on the TLEDs spec sheets, please say so explicitly.    b) If TLEDs will be allowed to be used with electronic instant start ballasts that do not appear on the TLEDs spec sheets, please list the additional requirements that must be taken to ensure compatibility and safety (e.g. "TLED must be installed in a manner that is consistent with all requirements listed in the TLEDs specification sheet.") | Added new requirement that states: “ The LED T8 Lamp must be installed in a fixture using a ballast found on its compatible ballast list.” |
| On pages 8 and 9, it is implied but not directly stated the 145 LPW or higher specification is based on the DLC test reporting (which would ensure that these results are based on 3rd party testing).  Please modify to clarify (e.g. "TLEDs must be on the current DLC qualified products list and have a listed efficacy there of 145 LPW or higher"). | Added suggested language to eligibility requirements. |
| On page 20 in the Measure Case Material Cost section, the workpaper notes that costs were obtained from web scraping for Type A TLEDs between 142-147 LPW.  We believe it would be more appropriate to base costs only on TLEDs that meet the eligibility requirements identified in the workpaper.  Please recalculate measure costs based on web scraping data for lamps with efficacy between 145-150 LPW. | Updated the efficacy range as suggested. Price increased from $11.03 to $11.20. Price was updated throughout all documents as applicable (Cost Calculations, EAD, MeasureDataSpec) |