



**December 22, 2008**

**Erik Kaye**  
**Senior Policy Advisor, Energy Efficiency**  
**Energy Efficiency Branch**  
**Ministry of Energy, Mines and Petroleum Resources**  
**Government of British Columbia**

Thank you for providing our association with the opportunity to comment on the regulatory summary and appendix outline of the proposed regulation under the British Columbia Energy Efficiency Act, with respect to General Service Lighting.

**Electro-Federation Canada:** is a national not-for-profit industry association is comprised of 7 councils. Together all 7 councils represent over 300 member companies that manufacture, distribute and service electrical, electronic and telecommunications products; contributing over 50 billion dollars to the Canadian economy and employing more than 130,000 workers in more than 1,400 facilities across Canada.

**EEMAC - Electrical Equipment Manufacturers Association of Canada:** is a Council within Electro-Federation Canada (EFC), and the meeting place for more than 100 companies involved in the manufacturing and sale of electrical products, systems and components in Canada. EEMAC focuses on the economic well being of the industry in a variety of ways on behalf of its membership.

We have been directly involved with the proposed Natural Resources Canada regulations for general service lighting and feel that they provide a useful context for review of this proposal.

On April 25, 2007, the Government of Canada has set minimum efficiency standards for general service lighting that will eliminate most common incandescent A-shaped bulbs by 2012. This approach is largely harmonized in terms of scope and exclusions with programs that come into effect in the United States starting in 2012. While there is a difference in the structure of the standard, it is expected that, for the typical light output of lamps currently on the market, the efficacy levels adopted in the United States are equivalent to those in the Regulation.

Our basic position is that North American harmonization in test methods, effective dates and performance along with adequate implementation time is the preferred approach. We believe that this facilitates international trade, reduces the risk of non-compliance and potential dumping of obsolete inefficient stock, and reduces transitional costs which are ultimately borne by consumers. As shown in the table, we will potentially have to deal with 4 different implementation schedules in North America. NRCan states that they strive to harmonize except for individual cases that may vary for policy, climatic or technical reasons. We have not seen any specific information to support the need for different schedules at the Federal or provincial level in Canada.

Wattage of Targeted Incandescent Bulbs	NRCAN Proposed Effective Date	Province of BC Proposed Effective Date	US Federal Effective Date	Proposed California Effective Date
25W	December 31, 2012	Exempt		
40W	December 31, 2012	December 31, 2012	January 1, 2014	January 1, 2013
60W	January 1, 2012	December 31, 2012	January 1, 2014	January 1, 2013
75W	January 1, 2012	January 1, 2011	January 1, 2013	January 1, 2012
100W	January 1, 2012	January 1, 2011	January 1, 2012	January 1, 2011
150W	January 1, 2012	Exempt		

The implementation of the BC MEPS is stated to be harmonized with the proposed timing for California which is one year in advance of EISA. In the specific case of the January 1, 2011 effective date for 100W bulbs, this is consistent with the proposed California date and is considered to be achievable given the relatively small volume involved. We would suggest that the 75W date be changed to January 1, 2012 to be consistent with the California plan as stated. We support the planned date for 60W bulbs of December 31, 2012 and have encouraged NRCAN to accept this schedule.

We have not reviewed in detail the information contained in the net present value (NPV) analysis but do not have any specific issues with this information.

Please contact me if you need any clarification or more information from us. We look forward to working with you further with the implementation of this regulation.

Sincerely,



Wayne J. Edwards,  
Vice President, EEMAC