

By Email

Ministry of Energy, Mines and Petroleum Resources Energy Efficiency Branch PO Box 9314 Stn Prov Govt Victoria BC V8W 9N1

Email: energy.efficiency@gov.bc.ca

10th Sept 2019

Kind Attention: Cameron Shook

Energy Efficiency Standards Regulation- Amendment 7 Consultation General Service LED and Small Diameter Directional Lamps- Regulatory Proposal

Dear Cameron,

I am writing to you on behalf of members of Lighting section of Electro-Federation Canada (EFC). Electro-Federation Canada (EFC) is a national, not-for-profit industry association, representing over 220 companies that manufacture, distribute, and service electrical and electronics products in Canada; contributing over \$10B to the Canadian economy and employing more than 40,000 workers in more than 1,200 facilities across the country.

EFC members manufacture, distribute, market and sell a wide range of electrical products, including lighting, distribution equipment, industrial controls, motors and generators, transformers, wire and cable, wiring supplies and electric heating. These categories form the basis of EFC's Product Sections, offering a strong nucleus for members to discuss issues and opportunities pertaining to their company's product focus. In addition, EFC maintains a strong focus on electrical safety, sustainability, advocacy, codes and standards, and also serves as a hub of networking, education, and industry research.

In reference to the Amendment 7 on BC Energy Efficiency Standards Regulation, I would like to thank you on behalf of the entire lighting industry for the Regulatory proposal on General Service (GS) LED and Small Diameter Directional Lamps (SDDL), harmonizing the requirements with the Provincial regulations in Ontario and Quebec. As mentioned in the proposal, we concur with the BC proposal to remove LED lamps from the regulations. LED technology has improved considerably in the last few years, with innovation driving this industry. The manufacturers will continue to thrive for better performing & efficient products to increase satisfaction levels of customers and other stakeholders.

Your transparent regulatory development is a Role Model for successful implementation of the Regulations. We are confident that the proposed exclusion of GS LED lamps and the LED SDDL



lamps form the requirements of the energy performance standard would positively reflect on market transformation towards LED lamps and on Province's energy conservation targets.

Thanking the B.C. Ministry of Energy, Mines and Petroleum Resources again for reducing the certification burden from the lamp manufacturers and distributors.

Yours truly,

Gurvinder Chopra | Vice President, Standards and Regulation

Electro-Federation Canada 190 Attwell Drive, Suite 560 Toronto, ON M9W 6A9 Phone 416 312 0760 ©

cc:

- 1. Joseph Howley, Co-Chair, Lighting Product Section, EFC.
- 2. Dejan Lenasi, Co-Chair, Lighting Product Section, EFC.
- 3. Rob McIntyre, Manager- Product Sections, EFC.