

**From:** [mike@beoffthegrid.com](mailto:mike@beoffthegrid.com)  
**To:** [publiccomments@njcleanenergy.com](mailto:publiccomments@njcleanenergy.com)  
**Subject:** Comments on LED Tube rebate program in NJ  
**Date:** Thursday, September 25, 2014 4:42:35 PM

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The advancements in LED technology and 4' and 2' tubes have been part of our business for the last 7 years. Our clients have experienced excellent illumination, long life span and excellent pricing. Although the rebates are generous, the mine set of the general public to overcome the initial outlay to retrofit their existing fluorescent tubes is a major difficulty. The rebate program may be helpful. however the cost will continue to be an issue for the general public.

**From:** [William Amann](#)  
**To:** [publiccomments@njcleanenergy.com](mailto:publiccomments@njcleanenergy.com)  
**Subject:** LED Incentive  
**Date:** Monday, September 29, 2014 12:12:25 PM

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As an energy efficiency professional, I strongly endorse the proposed TRC incentives for LED linear lamps.

William Amann, P.E., DCEP, LEED AP  
President, M&E Engineers, Inc.  
Past Chair, US Green Building Council-NJ  
Chairman, Somerset County Energy Council  
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9/29/2014

NJ Clean Energy Program  
Care of C&I Market Manager TRC Energy Services  
900 Rte. 9 North  
Woodbridge, NJ 07096

### **Public Commentary T8 to LED Incentives**

Dear BPU and Market Manager,

While no one can deny the many benefits LED tubes provide to the rate base: before the state stands behind the technology... I wanted to make some observations regarding the state of affairs of the new LED technology and how it applies to retrofits of the current T8 technology

- **Issues** –Currently Occupancy Sensors require Program Start Ballast, LED can work well with Instant Start Ballasts when utilizing Occupancy Sensors
  - **Solution** - Offer incentive for occupancy sensors utilizing LED tubes to include Instant Start Ballasts
  
- **Issues** –Lamps will not work on all Instant Start Ballasts as initially thought. Not all ballasts are on the Philips compatibility list of approved ballast, therefore negating the warranty. Specifically many popular ballasts like Sylvania QTP4x32T8UNVISN SC are not on the Philips approved list. Sylvania warns that there are starting issues with ballast over 5 years old, which will adversely affect lamp starts. It is our understanding that currently Philips and Sylvania are the only major suppliers that produce a DLC approved product.
  - **Solution** – The BPU and Market manager should provide the ratepayer with a stronger warning that by offering an incentive: it is not an endorsement of the technology. Strongly suggest samples should be installed, in light of specific compatibility & compliance issues prior to NJCEP approval
  - Educate consumers to use the new retrofit only on ballasts under 5 years old.
  - Insist on Implementer to provide written warranty assurance from component manufacture for at least 2 years. Insist to provide the written warranty for the specific part number to the C&I Market Manager application submittal.
  
- **Issues**-By removing many of the T-8 Lamps especially in bulk, re-raises the issues of Mercury Disposal.
  - **Solution**- Insist that all linear fluorescent lamps be recycled as a requirement of the program

Comverge advocates the educated use of this technology for proper ratepayer utilization.

Thank you for providing a forum to voice our concerns.

Best Regards,

*Jeffrey A. Burger*

PJM C&I Demand Response  
And Infrastructure Services

**From:** [brecc.avellar@gmail.com](mailto:brecc.avellar@gmail.com) on behalf of [Brecc Avellar](#)  
**To:** [publiccomments@njcleanenergy.com](mailto:publiccomments@njcleanenergy.com)  
**Subject:** Proposed Changes to FY15 NJCEP Programs  
**Date:** Monday, September 29, 2014 8:05:35 PM

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**Hello. I am writing to express my support for the** Proposed Changes to FY15 NJCEP Programs. I am an energy efficiency consultant advising our clients on energy efficiency measures primarily in New Jersey office buildings. The proposed incentive for 2ft and 4ft T8 lamps would encourage more of my clients to switch from florescent 32W T8's to the more efficiency 15 to 18 W LED T8's and greatly expand their lighting efficiency and further reduce energy use in the State.

I strongly encourage the Board to accept these recommendations and expand the lighting prescriptive incentive program to include LED T8 lamps.

Thank you.

**Brecc Avellar**

Technology Principal

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**From:** [Ryan Holl](#)  
**To:** [publiccomments@njcleanenergy.com](mailto:publiccomments@njcleanenergy.com)  
**Subject:** FW: Request for Comments - Proposed Addition to C&I Prescriptive Rebates  
**Date:** Tuesday, October 07, 2014 5:12:43 PM  
**Attachments:** [Untitled attachment 00017.txt](#)

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Hello,

Thank you for sending this request for comments. We have been researching the viability of LED tubes for the last 5 years and believe the technology has finally come to maturation and support the inclusion of LED tubes for prescriptive rebates.

We suggest you consider a minimum wattage reduction to qualify for the incentive as Baltimore Gas and Electric has done in their program.

Based on all our research the majority of LED technologies will require new fixtures for maximum efficiency and longevity. However, there will be instances where tubes may be the best option and they will continue to improve over time. We believe the board and New Jersey should encourage TRC to consider allowing tubes to a prescriptive incentive but we hope a minimum wattage reduction target will be established to ensure the societal benefits ratepayer money is used.

We also think TRC should create a fact sheet and clearly make sure customers are aware of items to check before installing tubes to ensure the tubes are compatible with the existing fixtures and ballasts. This fact sheet should be sent with every approval letter to ensure the ratepayers have done their due diligence and don't take them out and replace them with T8 Lamps.

Thank you for your time and your review of our comments. Please feel free to contact us with any further questions.

Ryan  
732.668.2727

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Ryan Holl  
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**From:** ee-bounces@njcleanenergy.com [mailto:ee-bounces@njcleanenergy.com] **On Behalf Of** Jones,

Sheri

**Sent:** Thursday, September 25, 2014 3:53 PM

**To:** ee@njcleanenergy.com

**Subject:** Request for Comments - Proposed Addition to C&I Prescriptive Rebates

### **Request for Comments**

Proposed Addition to C&I Prescriptive Rebates

September 25, 2014

In keeping with the goals of Governor Christie's Energy Master Plan to reduce electricity use through energy efficiency technologies, TRC has proposed a revision to its compliance filing to add LED linear lamps as a prescriptive measure. Currently, LED linear lamps qualified by the Design Lights Consortium (DLC), are evaluated for incentives through the custom measures path. Once three or more projects have been approved through the custom measure path, the Market Manager typically will review and when appropriate, generate a prescriptive incentive recommendation.

TRC has recommended that the C&I Retrofit and C&I New Construction program descriptions be modified to add a new prescriptive rebate of \$5/lamp for 2' LED linear lamps and \$10/lamp for 4' LED linear lamps, respectively. All LED linear lamps must be listed either on the current DLC or ENERGY STAR® qualified products list to be considered for incentives. These lamps are intended to replace existing fluorescent technology resulting in significant energy savings and reduced maintenance costs to the customer.

Staff is requesting comments on the proposed revisions discussed above prior to submitting to the Board for consideration. Comments are due by COB October 8, 2014 and should be submitted to:

[publiccomments@njcleanenergy.com](mailto:publiccomments@njcleanenergy.com)

Please reference "Proposed Changes to FY15 NJCEP Programs" in the subject line.

Sheri Jones

Board of Public Utilities

44 South Clinton Avenue

Trenton New Jersey 08625

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[www.nj.gov/bpu](http://www.nj.gov/bpu)



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CHRIS CHRISTIE  
*Governor*

KIM GUADAGNO  
*Lt. Governor*

STEFANIE A. BRAND  
*Director*

October 8, 2014

**VIA Hand Delivery and Electronic Mail**

Honorable Kristi Izzo, Secretary  
New Jersey Board of Public Utilities  
44 South Clinton Avenue, 9<sup>th</sup> Floor  
P.O. Box 350  
Trenton, New Jersey 08625

Re: I/M/O Proposed Addition to C&I Prescriptive Rebates  
September 25, 2014 [LED Lighting]

Dear Secretary Izzo:

Please accept for filing an original and ten copies of the comments of the New Jersey Division of Rate Counsel ("Rate Counsel") addressing the above-captioned matter pursuant to the e-mail notice circulated by the Office of Clean energy ("OCE") on September 25, 2014. Rate Counsel would like to thank the Board of Public Utilities ("BPU" or "Board") for the opportunity to present comments on the proposal to add LED lighting rebates to the C&I Prescriptive Rebates program.

We are enclosing one additional copy of these comments. Please stamp and date the extra copy as "filed" and return it in our self-addressed stamped envelope. A copy of these comments is also being sent electronically to the [publiccomments@njcleanenergy.com](mailto:publiccomments@njcleanenergy.com).

**COMMENTS**

TRC, the C&I Market Manager for the New Jersey Clean Energy Program's ("NJCEP" or "CEP") proposes to add LED linear lighting as a prescriptive measure eligible for the CEP's C&I Prescriptive Rebates program. Under the current C&I program structure, qualifying LED linear lamps are evaluated for incentives under the Custom Measures subprogram. Typically, under the current guidelines, once three or more specific types of energy efficiency measures have been approved through the Custom Measure path, the Market Manager will review the measures and may recommend a prescriptive measure incentive, where appropriate.

TRC recommends that the C&I Retrofit and C&I New Construction program descriptions should be modified to add prescriptive rebates for qualifying 2' and 4' LED linear lamps, amounting to \$5/lamp and \$10/lamp, respectively. Qualifying LED linear lamps are intended to replace existing fluorescent lighting technology, resulting in significant energy savings and reduced maintenance costs for the customer. Massachusetts, New York and Vermont are among the other states currently offering LED lighting incentives.

According to the administrator of the CEP program, Applied Energy Group ("AEG"), the proposed rebates would be paid out of the existing Board-approved CEP budgets and no budget changes are proposed at this time. The LED Linear lamps would simply be added to the list of measures eligible for prescriptive rebates. Rate Counsel also reviewed the documentation provided by AEG in support of the proposed LED linear lamp rebates.

Based on the representations and analyses provided in support of the proposed rebates for LED linear lighting, Rate Counsel does not oppose the proposed changes.

Thank you for your consideration of the within comments.

Respectfully submitted,

STEFANIE A. BRAND  
Director, Division of Rate Counsel

By:

  
Kurt S. Lewandowski, Esq.  
Assistant Deputy Rate Counsel

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