

BEFORE THE NEVADA GOVERNOR'S OFFICE OF ENERGY DIRECTOR

COMMENT / REPLY INFORMATION FORM

Rulemaking to adopt, amend, or repeal)
regulations pertaining to Chapter 701)
of the Nevada Administrative Code related)
to modifications and additions to NAC701)
_____)

Please complete the following information and submit this form along with your comments¹:

Date of Filing: October 18, 2019

Method of Filing: via Email U.S. Postal Mail Fax

Name of Person Commenting: Virginia Valentine

Name of Organization (if applicable): Nevada Resort Association

Address: 10000 W. Charleston Blvd., Suite 165, Las Vegas, NV 89135

Phone Number: 702-735-4888

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Email address: valentine@nevadaresorts.org

Do you wish to be placed on the email service list for this matter to receive any further notices? (Mark One)

Yes No

Note: Submitted comments are part of the public record for the rulemaking and may be posted on the web.¹

Please refrain from making any changes to this form. Thank you.



October 21, 2019

Robin Yochum
Program Manager
Nevada Governor's Office of Energy
755 N. Roop Street, Suite 202
Carson City, NV 89701

Dear Ms. Yochum:

In accordance with Nevada Revised Statutes, this letter serves as our submission of comments on behalf of Nevada's resort industry in regard to the economic ramifications of the Governor's Office of Energy's proposal to adopt regulations setting minimum standards for general service lamps as it relates to AB 54.

As you know, the Nevada Resort Association represents gaming resorts across Nevada, all of whom will be affected by the proposed changes to general service lamps given the variety of specialty lighting utilized throughout resort properties.

It is critical to note from the start, that our industry stands with the Office of Energy in its deep commitment to ensuring environmental sustainability through conservation and higher lighting efficiency standards. Our members have invested tens of millions of dollars upgrading lighting systems to higher efficiency alternatives on a voluntary basis and will continue to do so because of its economic and environmental benefits.

That being the case, our members have some concerns regarding how AB 54 could be interpreted. Given the definition of "general service lamp" and "general service LED lamps," we are concerned its implication may extend to specialty commercial lamps used for unique lighting situations designed with distinct performance applications with throughout resort properties.

We would like to respectfully offer some changes to the draft regulations developed by the agency for your consideration.

Specifically, in Section 2(c), we suggest the following language be added:

- (27) *Lamps used in commercial specialty lighting applications where suitable replacement lamps of higher efficacy do not exist (i) to maintain the existing design conditions or (ii) to maintain compatibility with existing dimming systems.*

This exemption would address situations where high-efficiency replacement lamps do not currently exist for some applications such as flame-tip incandescent bulbs in glass chandeliers. It also addresses incompatibility issues that could arise between some solid-state LED lamps and dimming systems.

In addition, we would respectfully request the following be added as a new Section 3:

The Director shall allow applicants to request an exemption to the lighting standards developed for general service lamps if the following conditions are met: (i) the lamp is being used in a specialty application; (ii) the lamp is installed in a non-residential space; (iii) replacement of the lamp would create a financial hardship on the applicant; and (iv) a replacement option does not exist to maintain the design intent of the current application.

Without these proposed changes, our industry would face an extensive economic burden in working to replace entire lighting systems with less desirable systems that would impact the customer experience and reduce our flexibility. As technology improves, we will continue to identify high efficiency and sustainable options because we know it's the right thing to do.

We appreciate your consideration of our perspective. We are available to discuss this matter further or provide additional information. Thank you for your time and your service to our community.

Sincerely,



Virginia Valentine
President

cc: David Bobzien, Director