



National Electrical Manufacturers Association

The association of electrical equipment  
and medical imaging manufacturers  
[www.nema.org](http://www.nema.org)

February 4, 2021

The Honorable Paul Pinsky  
Chairman Senate Committee on  
Education, Health and Environmental Affairs  
Room 2 West Wing  
Miller Senate Office Building  
Annapolis, MD 21401-1991

Via email: [paul.pinsky@senate.state.md.us](mailto:paul.pinsky@senate.state.md.us)

**Re: NEMA Opposes Senate Bill 0418**

Dear Senator Pinsky:

I write on behalf of the National Electrical Manufacturers Association (NEMA) which represents companies in the electroindustry. NEMA Members make a broad range of electrical products from energy management systems, to lighting products, to electric motors, and many others.

NEMA opposes the lighting-related portions of SB0418 which includes language proposals to create unrealistic regulations for High Color Rendering Index (CRI) Fluorescent Lamps. We are taking this opportunity to offer insights into the potentially negative and likely consequences this bill could have on Maryland residents.

The Standards proposed in this bill for High-CRI Fluorescent Lamps would have the effect of banning the sale of these lamps in the State. These lamps have typically been used in residential applications in basements and home workshops, usually in “shoplite” fixtures operated with *low power* ballasts. If the aforementioned lamps cannot be sold in MD, residents will have no suitable replacements for their fixtures. Claims of ready alternatives for these products are overoptimistically based and omit technical compatibility problems with low power ballasts. Neither T8 fluorescent lamps nor linear LEDs (TLEDs) will work in these High CRI T12 fixtures due to the specific ballast they are installed with. Residents who have these fixtures will be forced to *replace* entire current fixtures instead of replacing only the lamps, thus incurring additional costs – first for the new fixture and, in many cases, for the cost of an electrician to install it. These costs to the consumer will exceed the energy savings benefit

Additionally, the potential energy savings from banning these lamps claimed by advocacy groups are greatly overstated. NEMA conducted a study on potential energy savings and found that only approximately 3% of the national energy savings claimed in the *States Go First*<sup>1</sup> report from the Appliance Standards Awareness Project (ASAP) would actually be attainable by banning High CRI T12 Fluorescent Lamps. NEMA would welcome the opportunity to discuss our energy savings findings with you and your staff. We are concerned about the substantial burden to be placed on HI residents in the pursuit of questionable energy savings claims.

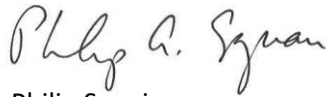
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<sup>1</sup> <http://appliance-standards.org/sites/default/files/States%20Go%20First.pdf>

We urge you to strike the aforementioned language because this proposal will not appreciably reduce electricity demand in MD or lower residents' electric bills, and the added costs of installing unexpected replacements for High CRI lamp fixtures will work against the intended goals of SB0418 and against those citizens struggling to overcome the economic impacts of COVID in the State.

In view of the unbalanced, negative impacts of the proposed lighting-related language in SB0418, NEMA recommends it be removed from future attempts at passage of this bill. For further discussion, clarifications or questions, please contact my colleague, Alex Boesenberg at [Alex.Boesenberg@nema.org](mailto:Alex.Boesenberg@nema.org) or 703-841-3268.

Sincerely,



Philip Squair  
Vice President of Government Relations  
National Electrical Manufacturers Association (NEMA)

*NEMA represents some 325 electrical equipment and medical imaging manufacturers that make safe, reliable, and efficient products and systems. Our combined industries account for 370,000 American jobs in more than 6,100 facilities covering every state. Our industry produces \$124 billion shipments of electrical equipment and medical imaging technologies per year with \$42 billion exports.*