

# RE7-19

IECC: R202 (IRC N1101.6), R404.1 (IRC N1104.1)

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## 2018 International Energy Conservation Code

### SECTION R202 (IRC N1101.6) GENERAL DEFINITIONS

**Revise as follows:**

**HIGH-EFFICACY LAMPS. LIGHT SOURCES.** Compact fluorescent lamps, light-emitting diode (LED) lamps, T-8 or smaller diameter linear fluorescent lamps, or other lamps with an efficacy of not less than ~~the following:~~ 65 lumens per watt, or luminaires with an efficacy of not less than 45 lumens per watt.

- ~~1. 1.60 lumens per watt for lamps over 40 watts.~~
- ~~2. 2.50 lumens per watt for lamps over 15 watts to 40 watts.~~
- ~~3. 3.40 lumens per watt for lamps 15 watts or less.~~

**R404.1 (IRC N1104.1) Lighting equipment (Mandatory).** Not less than 90 percent of the permanently installed lighting fixtures shall contain only ~~high-efficacy lamps.~~ lighting sources.

**Reason:** The lighting section includes a requirement for a minimum percentage of "high efficiency lamps." However, the definition of "high efficacy lamps" has not been updated to reflect the changes in the market due to increased federal minimums and greater availability/affordability of LED lighting. Because of this, the code is actually becoming less stringent as the baseline for lighting equipment is raised.

The proposal solves this problem by updating the definitions with lighting requirements that reflect what is actually "high-efficacy" in today's market. The proposal also simplifies the definition by reducing the number of wattage categories. The categories in the residential code are an artifact of incandescent and early compact fluorescent lamp wattages. As lamps have gotten more efficient, the higher wattage categories have become less meaningful. As lamps have gotten more efficient, the higher wattage categories have become less meaningful. Even a "100W equivalent" LED lamp and "60W equivalent" CFL lamps generally uses 15W or less, which is the lower category in the existing definition. As a result, the categories have become largely meaningless.

The proposal also accommodates high efficacy luminaires. Many luminaires on the market do not include lamps and include integrated LEDs instead. The way the current code language is written, these efficient lighting products cannot be used to meet the lighting efficiency requirements in the code. The proposal changes the term in the definition to be more inclusive, adds an efficacy requirement for integrated luminaires, and updates the code language to reflect this update.

**Cost Impact:** The code change proposal will increase the cost of construction

This change could potentially increase the cost of construction because it requires higher efficacy lighting (lamps and/or fixtures), which will likely eliminate some lower-end CFL options and/or push builders to newer LED technologies. However, the cost of LEDs has been steadily declining over the last several years and is expected to continue to decline. Based on an analysis by the U.S. Department of Energy's Building Energy Codes Program conducted during the 2018 IECC Code Development cycle, the estimated and projected prices for LEDs were \$4.84 per lamp compared to CFLs at \$3.10 per lamp. However, the rapid expansion of the LED lighting market has changed the economics. A spot check of Home Depot in early 2019 showed that a warm white, 60W equivalent A-lamp is as low as \$1.24 for both CFL and LED when purchased in packs. And, LEDs are actually cheaper than CFLs at some sources. At 1000bulbs.com, an online retailer, the same lamps are \$1.79/bulb for CFL and \$0.99 for LED. Therefore, this code change may actually reduce the cost of construction.

Proposal # 5184

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