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Mr. Alex Baker
U.S. Environmental Protection Agency
Ariel Rios Building 6202J
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Mr. Richard Karney
U.S. Department of Energy
1000 Independence Avenue, SW, EE2J
Washington, DC 20585

Dear Messrs. Baker and Karney:

Pacific Gas and Electric Company (PG&E) would like to commend the Environmental Protection Agency (EPA) and the Department of Energy (DOE) in their efforts to coordinate, streamline, and enhance the processes for ENERGY STAR qualified lighting. We support the enhancements described in the ENERGY STAR Qualified Lighting Integration Proposal released by the EPA and the DOE on December 4, 2009. We look forward to strengthening our partnership as we move forward together to enhance this program.

In addition to the comments submitted by the Consortium for Energy Efficiency, which PG&E supports, PG&E respectfully submits the following comments in response to the Qualified Lighting Integration Proposal.

In general, PG&E supports the efforts to create an integrated program for qualified lighting products. We appreciate the chance to review the proposed integration plan and look forward to participating in the stakeholder review process as the details of the program are developed.

Technology Neutral

The integration plan indicates that ENERGY STAR will pursue a “technology neutral” approach to a lighting program. PG&E would like to ask for clarification on what is meant by “technology neutral.” We believe this to mean that any lamp or light source will be reviewed based on equal performance requirements. While PG&E understands the desire for technology neutrality, we believe the more important goal is development of an “integrated” program that supports market transformation in lighting energy efficiency improvements. Such a program may not be technology neutral in all aspects.

For example, PG&E believes that solid-state lighting (SSL) is a groundbreaking technology that has the potential to deliver significant energy savings in the coming years. At this early stage of market introduction of SSL, PG&E believes it is important to set clear and stringent standards for product quality for this technology to try to keep inferior products from tainting the market. ENERGY STAR can be an important tool in setting these performance expectations, but should recognize that specific standards may be needed for these emerging technologies that are not necessarily applicable for mature technologies.

In addition, due to the unique aspects of different lighting technologies, there may be some instances where a distinction needs to be made in the specification based on the light source. For instance, the specification may need to reference two different IESNA test procedures for a fixture, one for an SSL source and one for a fluorescent source; or the specification may need to reference two different methods for validating the “life” of the light source, since the “life” of different light sources is defined differently. In these cases, the specification would not be “technology neutral,” but would be “integrated.”

For these reasons, PG&E believes that an integrated program for lighting should retain the flexibility to be technology specific where appropriate.

Decorative vs. Functional

The integration plan proposes to categorize lighting fixtures as decorative, functional, or both based on the 2009 NEMA/ALA document “Solid State Lighting—Definitions for Functional and Decorative Applications” and to use different compliance approaches for decorative and functional fixtures. PG&E has concerns with this approach, particularly since the NEMA/ALA document defines many lighting categories as both functional and decorative. This ambiguous “both” category could potentially create a loophole where the manufacturer would choose the easiest path for approval, but could then promote and sell the product for both decorative and functional uses.

PG&E encourages developing clear and specific program implementation guidelines that allow only a single path for compliance for any specific lighting product.

The NEMA/ALA document categorizes wall sconces as decorative only. In PG&E’s experience, wall sconces are often used as the sole source of light in hallways, bedrooms, and other applications. In these instances, the wall sconces are certainly used as a functional fixture.

PG&E encourages categorizing wall sconces as functional fixtures for ENERGY STAR compliance.

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Commercial Light Fixtures

PG&E supports qualification of commercial SSL lighting products under the existing SSL V1.1 and the proposed SSL V1.2. At this early stage in the adoption of the technology, PG&E believes it is important to set clear and stringent standards for product quality for this technology to ensure manufacturers do not sacrifice quality for short-term performance and efficiency.

PG&E supports ENERGY STAR in the expansion of the specification for commercial lighting products to include other equally efficient lighting sources and fixture design.

In addition, PG&E encourages the integration of ENERGY STAR products and technologies into a Commercial Whole Building approach. We believe the label ensures that emerging technologies and products with a wide range of attributes enhance the performance of the Whole Building benchmark, pushing the expectation for additional energy efficiency.

Thank you for your consideration of these comments. Please contact PG&E Senior Program Manager Dave Alexander at 415.973.3091 with any questions.

Sincerely,

A handwritten signature in cursive script that reads "Duane F. Larson". The signature is written in black ink and is positioned below the word "Sincerely,".

Duane F. Larson