



May 15, 2007

Rich Karney
US Department of Energy
1000 Independence Avenue, SW
Washington, DC 20585

Dear Mr. Karney:

The Consortium for Energy Efficiency (CEE) respectfully submits the following comments on Draft 2 of the ENERGY STAR Program Requirements for Solid State Lighting (SSL) Luminaires, released by DOE on April 9th, 2007. These comments are provided to inform DOE and EPA of CEE's position on several aspects of the specification excluding major items that we are aware are still under discussion between the agencies. (These include technology neutrality, implementing agency, and the extension of the lighting label to the commercial market.)

The comments were developed by the CEE Lighting Committee (Committee). The organizations listed at the end of this letter have chosen to indicate their strong individual support for these comments.

Testing Issues

CEE supports the proposal to measure and report efficiency using luminaire efficacy rather than system efficacy for Category A products (which are functional, not decorative luminaires). We recognize that this is a departure from current ENERGY STAR lighting specifications (one of several including lumen maintenance and CCT), and understand the technical rationale behind the proposal. However, CEE notes that this method of describing efficacy may not be feasible or meaningful for purely decorative light fixtures (which would be included in Category B), and we encourage ENERGY STAR to engage the lighting fixture industry to determine an approach for Category B prior to its inclusion in the program.

CEE understands that testing luminaire efficacy can be burdensome to fixture manufacturers and supports ENERGY STAR's efforts to respond to the lighting industry's comments on this point. Based on our reading of the proposed specification, we conclude that the success of the proposed approach is dependent upon a robust and effective quality assurance (QA) mechanism.

While CEE supports the concept of QA testing, we find that the draft specification lacks detail about how the testing would be done. Therefore, we urge ENERGY STAR to adopt the third party testing language from the ENERGY STAR CFL specification into the SSL specification, with modifications if necessary. This level of specificity is needed for several reasons. First, stakeholders must have this information to comment on the appropriateness of the proposed sampling test method and accompanying QA process. Second, we believe sufficient lead time is necessary for industry to understand requirements and responsibilities in QA testing, in order to prepare adequately.

CEE would also like to comment on the proposed requirement for lab results to be generated by NVLAP or one of its MRA signatories. As noted on the April 25th conference call with EPA and DOE, a CEE member noted that testing done by manufacturers to qualify their CFLs for ENERGY STAR has often yielded more positive results than testing done by PEARL of the same products being sold at retail. Based on this information, CEE recommends that qualification testing for SSL products be carried out at independent, third-party, NVLAP accredited laboratories not controlled by manufacturers. Further, unlike the ENERGY STAR CFL spec, the draft SSL spec also would explicitly allow the use of test results submitted by NVLAP MRA signatories for ENERGY STAR qualification. We are concerned that this could introduce yet more questions as to the reliability of product qualification data.

Off-State Power Consumption

CEE applauds ENERGY STAR's efforts to reduce standby power consumption by requiring zero off-state power consumption in most ENERGY STAR SSL fixtures. We understand and agree with the exceptions for fixtures with integral occupancy-, motion-, or photo-controls.

Program Coordination

In addition to commenting on the draft specification, CEE is also commenting on overall ENERGY STAR program coordination; a well-coordinated program is essential to the success of any given specification. As CEE has stated in the past, the ENERGY STAR Lighting Program is unique because both DOE and EPA are involved in its management. The success of the program requires a high level of communication and coordination between the managing agencies. We understand that there are unresolved differences of opinion about the use of ENERGY STAR for SSL and urge DOE and EPA to work together to come to consensus.

If these differences are not resolved, we fear damaging implications for lighting efficiency and the effectiveness of the brand. To provide an example of these implications, we describe below how programs are affected by the current disagreement between EPA and DOE regarding extension of the label to commercial lighting.

In many respects, efficiency programs rely on ENERGY STAR to "set the agenda" at the national level. ENERGY STAR's work setting specifications and providing program tools provides guidance to programs about where savings opportunities lie and how they should be pursued. In order to develop effective programs, CEE members need ENERGY STAR to deliver this guidance with one voice. Conflicting information is confusing to programs, and hampers their ability to meet their energy savings goals.

In addition to needing ENERGY STAR to speak with one voice, in cases where changes represent a major departure from a current approach, CEE members also need EPA and DOE to consider and address implications to efficiency programs. If DOE, EPA, and stakeholders all agree that extending the ENERGY STAR label to SSL in commercial applications is appropriate, efficiency programs need to be provided with guidance on how their existing commercial building programs and commercial lighting programs should be modified.

For instance, due to the previous ENERGY STAR focus on whole buildings, CEE is in the final stages of an agreement with the National Electrical Manufacturers Association (NEMA) on a commercial lighting label under the banner “NEMA Premium.” It is unclear how this label would interact with an ENERGY STAR label for SSL fixtures in commercial applications. To CEE’s knowledge, these program-level issues have not been considered.

Thank you for your consideration of these comments. Please contact CEE Senior Program Manager Rebecca Foster at (617) 589-3949 ext. 207 with any questions.

Sincerely,



Marc Hoffman
Executive Director

CC: David Rodgers, DOE
Kathleen Hogan, EPA
Peter Banwell, EPA

Supporting Organizations

BC Hydro
Cape Light Compact
Commonwealth Edison Company
Efficiency Vermont
Energy Trust of Oregon
Long Island Power Authority
National Grid
New York State Energy Research & Development Authority
Northeast Energy Efficiency Partnerships
Northwest Energy Efficiency Alliance
NSTAR Electric & Gas
Pacific Gas & Electric
Sacramento Municipal Utility District
San Diego Gas & Electric
Seattle City Light
Southern California Edison
Tacoma Public Utilities
Western Massachusetts Electric Company
Wisconsin Division of Energy
Wisconsin Focus on Energy Program