



Rich Karney  
ENERGY STAR Program  
US Department of Energy  
1000 Independence Avenue SW  
EE2J  
Washington, DC 20585

Dear Rich:

On behalf of the Northwest Energy Efficiency Alliance (NEEA), I would like to support the draft ENERGY STAR performance criteria for Solid State Lighting (SSL) Luminaires intended for general illumination. As a regional organization, NEEA's interests are to encourage the development and adoption of energy-efficient products and services. We have and will continue to support the Lighting For Tomorrow project that highlights SSL products that demonstrate some of the unique attributes of the light source. We also recognize the importance of developing an ENERGY STAR designation for SSL luminaires that will give consumers the comfort of knowing that these products will meet their performance expectations.

In July 2005, NEEA participated in comments submitted by the Consortium for Energy Efficiency (CEE) jointly to the DOE and EPA ENERGY STAR Programs calling out the importance of establishing a comprehensive set of standardized, industry-accepted test procedures appropriate for [SSL] technology. Specifically, we stated that "such test methods are a necessary precursor to any ENERGY STAR program" and that "no specification should be launched until that development is complete." The draft program requirements that DOE has proposed are an excellent starting point and clearly identify where there is still work to be done to finalize test procedures, but we would like to see a timeline for the completion of the various test procedures as it relates to the finalization of the criteria.

While we encourage ENERGY STAR program requirements and management that is agreeable between both ENERGY STAR agencies (EPA and DOE), we believe that it makes the most sense to have requirements that recognize the uniquely different performance characteristics of the SSL luminaire and give the best chance for quality products to qualify for the ENERGY STAR designation.

Thank you for your consideration of these comments.

Sincerely,

Marci Sanders  
Sr. Manger, Residential Sector