



Leading the Way to a Brighter Future

A program of the Maine Public Utilities Commission

August 15, 2008

Mr. Alex Baker
ENERGY STAR Lighting Program Manager
U.S. Environmental Protection Agency
Ariel Rios Building
6202J 1200 Pennsylvania Avenue
Washington, DC 20460

Re: ENERGY STAR Residential Light Fixture Specification 4.2

Dear Mr. Baker:

Efficiency Maine is pleased to have the opportunity to comment on the technical amendment to the ENERGY STAR RLF Specification 4.2. Efficiency Maine is the statewide energy efficiency program of Maine funded by electricity consumers and administered by the Maine Public Utilities Commission. Efficiency Maine actively supports the Energy Star programs and utilizes Energy Star specifications in both residential and commercial energy efficiency programs.

With specific regard to solid state lighting technology and its potential to reduce electrical consumption and pollution, Efficiency Maine is actively engaged in increasing consumer awareness of this field. Through our technical assistance and equipment incentive programs we are currently involved in pilot projects that utilize the technology for interior and exterior general lighting.

The Efficiency Maine staff has been discussing the proposed Energy Star RLF 4.2 specification internally and with the operators of efficiency programs in New York, Massachusetts, Connecticut, and Vermont. We have the following concerns regarding the introduction of the RLF 4.2 Specification.

- The EPA specification conflicts with the DOE ENERGY SSL 1.0 specification, covering many of the same product categories, while introducing different requirements and testing procedures. This could cause confusion in the marketplace and slow production and adoption of the technology.
- The success of solid state lighting for general illumination and decorative lighting will depend upon not only energy savings, but also on the quality of the fixtures and the light produced. RLF 4.2 supports low efficacy, cold color temperature products in addition to the high efficacy warm light products that represent the future of the solid state lighting market. Low quality products are likely to have a negative effect on consumer acceptance of solid state lighting for general illumination.

- Most importantly - at times of high energy prices, energy conservation is a strong motivator in the marketplace. This same market situation was present when the first generation of consumer compact fluorescent lamps was introduced to the residential marketplace, and electronic ballasts were introduced to the commercial marketplace. Both products were heavily promoted with specifications that did not effectively deal with product quality. It has taken nearly 20 years to undo the damage that was done by those weak specifications. RLF 4.2 sets us on a course to potentially repeat those mistakes.

Efficiency Maine supports a single specification to guide manufacturers and consumers as they manufacture, distribute, sell, and purchase solid-state lighting products.

We urge the Energy Star Program to support the previously released DOE ENERGY SSL 1.0 specification and work cooperatively with the DOE to successfully develop the market for solid state lighting.

Yours truly,

A handwritten signature in black ink, appearing to read "Chris Simpson". The signature is fluid and cursive, with a large initial "C" and "S".

Chris Simpson
Director, Energy Programs
Maine Public Utilities Commission

CC: Sharon Reishus
Vendeen Vafiades