

# Northeast Energy Efficiency Partnerships, Inc.



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Dear Alex & Rich-

I am writing with regard to the situation with respect to the ENERGY STAR program for solid state lighting, specifically the emergence of separate specifications from both agencies.

As you know, NEEP is deeply involved in working with efficiency programs, manufacturers, retailers and the trades in order to transform markets by making the most efficient choice the first choice. The core premise of our work is that removing market barriers enables success regardless of the technology or practice. The existence of multiple specifications addressing the same solid state lighting products creates numerous barriers and heightens numerous others. For example:

- Consumer confusion
  - Which ENERGY STAR should I buy?
  - What's the difference?
- Manufacturer, retailer and design/trades confusion
  - To what specification do I manufacture, test and qualify products?
  - What do I stock?
  - Which do I specify and/or install?
- Paralysis of efficiency programs
  - How can savings be calculated?
  - How can any ENERGY STAR SSL be supported when the underlying requirements vary so much?

The impact of having multiple specifications creates potentially insurmountable problems for all market actors in the solid state lighting arena and threatens the successful commercialization of the technology as whole. In addition, NEEP acknowledges the merit of the Consortium for Energy Efficiency's comments on the ENERGY STAR Residential Light Fixture specification V4.2. and their stakeholder process.

NEEP urges DOE and EPA to resolve this most troubling situation.

Regards,

Edward J. Schmidt, Jr  
Director of Regional Initiatives