



Pacific Gas and  
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August 22, 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:

On July 10, 2008 the Environment Protection Agency (EPA) issued a letter to Energy Star stakeholders, soliciting comments on the SSL technical amendment to RLF 4.2. Pacific Gas and Electric Company (PG&E) is very appreciative of this opportunity to work cooperatively with the EPA on an Energy Star Residential Light Fixture Specification. PG&E is providing the following comments in response to that request.

PG&E values the Energy Star program and appreciates EPA's efforts to deliver a strong program, along with those of the co-administrator, the Department of Energy (DOE). In our efforts to deliver energy efficiency to our customers, PG&E looks to Energy Star as a tool to inform our customers of high quality, energy efficient products.

As a strong proponent of energy efficient innovations, PG&E shares the growing enthusiasm for solid-state lighting (SSL) and believes SSL has the potential to help customers save energy and to help our country address the serious energy and climate change challenges facing us. However, as we learned with compact fluorescent lighting, introducing products that do not meet customer expectations can seriously set back market adoption. With our aggressive energy savings goals, this would have a significant negative impact upon our success and the savings opportunities of our customers.

PG&E is very concerned that with the release of the current version of RLF 4.2, there is a risk of damage to the Energy Star brand and to efforts to advance the commercialization of quality SSL products. We believe that there are changes to the RLF 4.2 specification that could protect against inferior quality products becoming Energy Star qualified. Further, PG&E believes that the two SSL Energy Star programs are currently creating confusion in the market and this should be remedied. As they are written today, the two specifications do not serve manufacturers, utilities, consumers, and the broader energy efficiency community in a useful manner.

August 22, 2008

PG&E, through the Consortium for Energy Efficiency (CEE) and through direct communications with EPA staff, provided detailed comments outlining our concerns regarding RLF 4.2. We reiterate these concerns and reference the letter from CEE dated July 10, 2008. Additionally, through this same CEE letter, PG&E requested that EPA suspend RLF 4.2 until the issues noted are resolved. We believe this is still important to reduce the current marketplace confusion over Energy Star for SSL while potential changes are being considered.

If, working together, we are still unable to resolve these issues and end up with a revised specification that will meet the needs of our customers, PG&E will not be able to include products qualified under the proposed RLF 4.2 specification in our SSL incentive programs.

We look forward to working cooperatively with EPA to resolve these issues in a manner that maintains the integrity of the Energy Star program and that serves the best interests of consumers and our energy future.

Should you wish to discuss our comments, please do not hesitate to call me at 415.973.8437.

Sincerely,

A handwritten signature in black ink that reads "Roland J. Rissen". The signature is written in a cursive style with a large, stylized initial "R".

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