



January 13, 2010

Kate Buck
ICF International
2222 East NC 54 Highway, Suite 480
Durham, NC 27713

Re: NEEP Comments on ENERGY STAR Qualified Lighting- An Integration Plan

Dear Ms. Buck:

Northeast Energy Efficiency Partnerships (NEEP) appreciates the opportunity to comment on EPA's December 4, 2009 Integration Proposal for ENERGY STAR Qualified Lighting.

Introduction

The efficiency programs that operate throughout the Northeast have and will continue to rely heavily on the ENERGY STAR platform to promote the benefits of energy efficiency. As the facilitator of the Northeast Retail Products Initiative and the coordinator of efficiency program efforts in the region in general, NEEP enjoys a unique position of working closely with a broad group of program administrators—all striving to maximize energy savings through their individual and collective efforts. NEEP staff have thoroughly reviewed the program plan and, even as we offer our own feedback, notes also our strong support for the comments submitted by the Consortium for Energy Efficiency's (CEE), to which NEEP is a signatory.

NEEP is supportive of and agrees with the plan to transition program management and marketing to EPA, while maintaining testing and verification with DOE, as this aligns with each agency's respective expertise. We strongly support as essential the timely clarification of roles and emphasize that cooperation and coordination among federal entities is critical to the success of ENERGY STAR from both a consumer and ratepayer funded efficiency program perspective.

Technology Neutrality

NEEP is very supportive of ENERGY STAR's move toward technology neutral lighting specifications. We understand that this goal is complex and requires ongoing guidance from stakeholders to ensure that the highest standards are met while also recognizing consumer needs. NEEP is eager to participate in this dialog to help provide the Northeast region's ratepayer funded efficiency program administrators the ability to harvest maximum energy savings through the ENERGY STAR brand. However, while a single "light bulb" specification is ultimately where the market should be led, we are concerned that solid state lighting (SSL) is still in its formative stages, potentially making it too early to integrate SSL specifications with those for compact fluorescent lamps (CFLs). We would suggest that this issue be specifically addressed via additional stakeholder discussion.

Functional and Decorative

NEEP agrees that separating residential lighting fixtures into functional and decorative categories is important, dividing the various products into different categories with different standards and testing procedures (light engine based vs. light fixture based). We believe this is a good solution to the debate as to whether to test fixtures at the luminaire or light source level in that it reflects the purpose of various types of fixtures and is consistent with the needs of the various market actors, including the



critically important consumer. There are certainly applications for which light output is the primary driver, and others for which product aesthetics drive purchasing decisions and consumer satisfaction, therefore it is appropriate that this be reflected in the way fixtures are qualified.

Payback

Meeting energy savings goals must mesh with simple payback expectations and demands of the consumer, and we support ENERGY STAR's move to include only products that provide reasonable payback periods of three to five years. We are concerned that this goal may, however, be punitive to select SSL products and suggest that this issue be specifically addressed via additional stakeholder discussion.

Coordination with Other Programs

Specific to SSL, NEEP encourages ENERGY STAR to continue to be mindful of and coordinate with complementary programs outside of ENERGY STAR. Specifically, we ask that ENERGY STAR continue to coordinate with the DesignLights Consortium's (DLC) Solid State Lighting Qualified Products List (QPL), which is a resource for NEEP's efficiency program sponsors and other participants throughout North America in support of their commercial lighting programs. Challenged by growing end-user demand for quality SSL products while mindful of their responsibility to be stewards of ratepayer funds, NEEP sponsors found themselves in need of a process to assure quality and performance of SSL products for commercial applications that are not yet covered by ENERGY STAR. The DLC (comprised of sponsors of NEEP's commercial lighting initiative) conferred with the ENERGY STAR SSL team, and developed a parallel process beyond, yet coordinated with, ENERGY STAR. For example, the QPL relies upon IES and UL test data similar to that required by ENERGY STAR. The DLC QPL information is found on www.designlights.org and is available to participating efficiency programs in 28 states and one Canadian province.

Conclusion

NEEP again extends our thanks to EPA for offering this opportunity to share our comments on the ENERGY STAR Qualified Lighting Integration Proposal, and we look forward to continuing our partnership with EPA and DOE to help guide all efforts to bring energy efficient lighting to the broader public.

Sincerely,

Linda Malik
Retail Products Program Manager