



Setting Standards for Excellence

The Association of Electrical and Medical
Imaging Equipment Manufacturers
www.nema.org

January 8, 2010

NEMA Comments on the December 4, 2009 Integration Proposal for ENERGY STAR Qualified Lighting

Thank you for the opportunity to provide the following comments on the proposed framework for the integration of ENERGY STAR lighting product programs.

We appreciate the clear statement made at the outset that changes to the individual programs will be considered through Energy Star's full notice and comment periods. This approach is essential to ensure that due process and broad stakeholder involvement are leveraged by the Agency and the Department in developing specifications, metrics, test procedures and verification programs.

However, concerns have been raised within our membership regarding the statement, "Energy Star Specifications will be set to identify approximately the top 25% most efficient models." These concerns are discussed further below.

Residential Light Fixtures

In the proposal EPA states,

Because consumers shop for light fixtures, rather than lighting technologies, it is important for the ENERGY STAR label to mean the same thing in terms of energy savings, regardless of technology.

Although this may not be true in all cases, we agree that consumers should be directed by Energy Star to the highest efficiency and highest quality fixtures. Growing consumer interest in solid state lighting technology – for its own sake – underscores the need for Energy Star to provide well justified and verified guidance on this technology in the short-to-medium term.

EPA is correct to leave the SSL fixture specification untouched in the short term. NEMA is pleased that the White Paper, "Solid State Lighting – Definitions for Functional and Decorative Applications" (LSD-51) has been recognized by EPA as a resource for the development of rational testing requirements for SSL fixtures. The proposal to resolve the current potential overlap between the RLF and SSL programs by employing the definitions set down in the White Paper – that is, to allow only LED-based fixtures classified by NEMA and ALA as "decorative" to qualify under the Energy Star RLF program – is a step forward primarily because it will rely on an industry-led approach. It will also allow, as EPA notes, additional industry-led, and, in some cases, DOE-supported, technical and standards work to be completed that will provide for high-quality and color-differentiated SSL products.

Over the long term, NEMA supports the proposal to integrate the RLF and SSL specifications into a single specification that is technology neutral to the greatest extent possible.

We look forward to assisting in the development of the draft specification, its release in mid-February, and an open and transparent stakeholder input and comment process.

Since the new specification aspires to be a new “animal”; that is, a true level playing-field for fluorescent and SSL technologies, EPA should seriously consider treating the specification as a new program – Version 1.0 – rather than a specification revision and allowing for the 270-day transition period between the finalization of the specification and the effective date. This will allow for sufficient time for market adjustment and preparation to take advantage of the new opportunities presented by the program.

Replacement Lamps

The LED lamp specification is scheduled to take effect in August 2010; EPA is correct to delay development of integration proposals until several months after that date. EPA is correct to consider pending changes to the lighting market under the Energy Independence and Security Act of 2007.

EPA must carefully examine integration of the CFL and LED lamp programs so that a definitive decision can be reached at a later date rather than with the issuance of the Integration Plan in January/February 2010. It is clear that the new residential lamp specification can combine a number of specifications within the current CFL and SSL specifications, but not all specifications. The standards would need to retain some separate specifications for CFL and some for SSL products. However, we believe these specific product deviations can be placed in one standard.

ENERGY STAR lamp labeling specifications must not conflict with the final FTC lamp labeling regulation expected in 2010. Manufacturers must follow FTC lamp labeling requirements as these are mandatory.

In the CFL lighting/replacement lamp category, approximately 90 percent of the product currently on shelves in the U.S. is Energy Star qualified. It is this broad application of the Energy Star label that has helped energy-efficient lighting penetrate the U.S. residential market. Furthermore, the Energy Star Retail Partner program has encouraged sales of Energy Star qualified products through retail channels to such a successful degree that Energy Star qualification has become a de-facto standard for sale through these partners.

If the above-referenced statement – on establishing specifications to identify only the top 25 percent of available products – is taken literally and specifications are reset accordingly, approximately 70 percent of Energy Star CFLs currently on the market will be ineligible and disqualified going forward, and retailers would have limited options for their customers. This would cause a huge disruption of the CFL market, a disruption that would occur concurrently with the federally-legislated phase out of less efficient incandescent lamps. Not only would this cause great confusion in the consumer base, it would likely lead to an immediate shortage of product at the retail level.

Furthermore, should new specifications require electronics changes, this would lead to mandatory retesting. Redesigns and testing would delay the ability of manufacturers to provide product due to potential electrical component shortages and testing and approval delays at testing labs.

Limiting Energy Star qualification to the top 25 percent of existing replacement lamp products would be counter-productive and lead to a decline in the penetration of replacement lamps.

Additionally, the new Energy Star specification for CFLs, Version 4.0, has been in effect for one year. To change again so soon would present significant challenges and costs to lamp suppliers who are currently preparing for the seismic changes the associated with the impact of the federal mandatory minimum energy efficiency standards.

Commercial/Industrial Light Fixtures

While NEMA and NGLIA have been strong supporters of the DOE Energy Star SSL program, we recognize the EPA approach of pursuing a technology-neutral specification for commercial lighting so that consumers are not artificially directed to one technology over another and can rely on the Energy Star program to identify the top-performing choices available. In fact, as noted in Table 3 of the proposal, NEMA is now working on a proposal for a technology neutral performance and energy efficiency metric for SSL outdoor pole-mounted roadway and parking lot lighting.

Verification and Quality Assurance Testing

Over the years, NEMA has been a major driver and supporter of strong measures to ensure each lighting product that carries the Energy Star logo has actually earned that distinction by meeting the specification's quality and performance metrics. We agree on the need for a "robust, comprehensive quality assurance program". However, we disagree that the CALiPER Program should be integrated into the Energy Star lighting QA program. CALiPER is valuable in evaluating products that may or may not be within the scope of an Energy Star specification and should remain independent from Energy Star.

We look forward to assisting DOE and EPA in development of a more comprehensive testing program for all Energy Star lighting products.

New Programs: Lighting Controls

Although the proposal is focused on current product programs, EPA is considering development of additional lighting programs. As discussed previously, the NEMA Lighting Controls Section supports and recommends creation of an ENERGY STAR labeling program for lighting controls. We appreciate the dialogue NEMA and EPA have had so far on the prospects for such a program and look forward to further communications and work in this regard.

Conclusion

The overall proposal to combine four existing ENERGY STAR lighting standards into three new standards for Lamps, Residential Fixtures, and Commercial/Industrial Luminaires is acceptable. There is a benefit to separating residential lighting fixtures into decorative and functional fixture types. It makes sense to base the efficiency of decorative types solely on the efficacy of the lamp/ballast (or source/driver) combination, but have some additional task-based requirements for functional fixtures. In contrast, commercial/industrial fixtures are designed with a higher degree of precision and require more stringent testing and photometric requirements.

This is a challenging time for EPA to undertake the transition and program integration outlined in the proposal. However, NEMA stands ready to assist and advise EPA and DOE at all times on the road ahead.

Please contact Craig Updyke of NEMA at 703 841 3294 or cra_updyke@nema.org with any questions on these comments.