From: Wright, Craig
To: ENERGYSTARVerificationProgram@energystar.gov;
cc: Regnaud, Steve; Lueken, Tom;
Subject: Draft Certification and Verification Requirements
Date: Friday, June 25, 2010 5:05:55 PM
Attachments: NIST-HB-150-1A-Checklist-2009.pdf

Following are comments from Hubbell Lighting on behalf of Progress Lighting and other HLI Energy Star partners. These comments may be shared with other Energy Star stakeholders to further discussions on related topics. To date, HLI has not received a reply to its previous comments submitted 05/14/10 related to recognition of accreditation bodies, and 06/02/10 related to lab requirements. In general, HLI supports the comments proposed previously by both NEMA and ALA related to this subject matter.

Certification

- It appears that this most recent draft of certification requirements is inconsistent with the first draft of the luminaires standard. The luminaires draft indicates that 'A test report from a laboratory accredited by an accreditation body recognized for luminaire testing under the Energy Star Program' is acceptable (page 7, draft 1). Please clarify this discrepancy.
- HLI recognizes that the changes to requirements for certification and verification testing are extremely important and must be taken with the highest regard through the comment process. Please clarify why the comprehensive standard (including luminaires) is planned to take effect 9 months after the document is published; however, the proposed laboratory and testing changes are planned to take effect roughly 5.5 months after publishing on July 19.
- HLI remains committed to its earlier comments related to industry-wide acceptance of NVLAP (photometric) and UL/CSA (electrical/thermal/mechanical) lab accreditations. These AB's have been widely accepted by industry stakeholders as well as consumers as providing an indication of product quality and safety. It is therefore deemed unnecessary for EPA to require anything in addition to these requirements.
- HLI requests that further evaluation and validation of the requirement for 3rd party certification testing be conducted by a panel of stakeholders representing various aspects of the industry. From HLI's perspective as a luminaire manufacturer, it is strongly believed that changes to lab accreditations will
    - raise costs and therefore market level pricing,
    - impede expedient release to market,
    - flood limited 3rd party capacity which will further delay introduction to market and elevate testing costs,
    - unnecessarily complicate lab accreditation and product certification processes currently in place that are already widely accepted.
    - Many of the specific requirements identified here as necessary for product qualification are already in practice via the NVLAP program. NVLAP guidelines have been provided for reference to EPA. http://ts.nist.gov/standards/accreditation/index.cfm
- Further to HLI's concern about 3rd party test lab capacity is the potential impact to re-qualify electrical components currently listed on the matrices managed and facilitated by NEMA and ALA. Given the relatively short time frame to re-qualify components essential to luminaires, and the uncertainty associated with 3rd party test lab capacity, it is essential that further study be done related to the planned effectivity of these program changes. HLI is not confident that components will be sorted through for re-qualification in a timely and efficient manner which will further complicate its requirements to re-qualify existing products using such components in addition to the potential for significant impact on qualifying new luminaires.
- In general, HLI stands behind the scope of comments submitted by NEMA 04/30/10, and by ALA 06/18/10.

Verification

- What is the rationale for testing 10% of qualified products for verification? It is recommended that a panel of Energy Star stakeholders be convened to explore the average costs of verification testing via 3rd party laboratories. This testing is extremely expensive (especially related to SSL products), and must be budgeted in

order to meet the expense demands incurred by stakeholders.

- HLI supports the recommendation from NEMA in its 04/30/10 comments related to stakeholders sharing the costs of verification testing.
- In its previous comments, HLI contested the requirement for all verification testing costs to be absorbed by the luminaire manufacturer. Purchase components such as lamps, ballasts, and drivers that are qualified separately should be absorbed by the respective manufacturers. If EPA acknowledges that they (or an assigned 3rd party) will coordinate verification testing, then it would seem reasonable for the coordinator to assign testing requirements as necessary to the appropriate components in the luminaire.

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