

From: Pekka Hakkarainen [mailto:phakkarainen@lutron.com]
Sent: Monday, September 15, 2008 7:35 PM
To: ssl@energystar.gov
Subject: ENERGY STAR's Solid State Lighting Luminaire Program Update - comments

I wish to make the following comments regarding the document ENERGY STAR Cat A Additions.final.doc:

1. The intensity distribution requirements for SSL luminaires in this document are much more detailed than for other luminaires historically. While it may be argued that they represent a vision or a goal for SSL luminaires, it should not be ignored that the LEED Rating System refers to Energy Star requirements, and some municipalities and building owners have made LEED a minimum requirement. It is a concern that very few if any SSL luminaires today would be able to demonstrate compliance with these requirements.
2. The minimum efficacy requirements are a concern for the same reason.
3. The color temperature options given for many luminaire categories do not make sense to me. A more sensible option would be to define a broad range of acceptable CCTs, rather than the discrete values (without tolerance bands) that were given.

Respectfully submitted,

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