american lighting association

June 18, 2010

American Lighting Association Comments
on the
ENERGY STAR Program Requirements for Luminaires
Version 1.0, Draft 1, Released May 7, 2010

Thank you for the opportunity to comment on the proposed requirements for this first version of the Luminaires part of the ENERGY STAR Lighting Program. These comments are intentionally general with the expectation that individual ALA members will submit detailed comments on specific items addressed in the Program Requirements.

The American Lighting Association represents manufacturers of luminaires, lamps, ceiling fans and controls, retailers of lighting products, component suppliers, designers and other stakeholders in the residential lighting market serving the needs of contractors, builders and consumers.

The ALA and its members have supported the ENERGY STAR lighting program from its inception. We continue to do so with a variety of activities including the Lighting for Tomorrow Energy-Efficient Lighting Fixture Design Program, now in its 8th year, which requires that all luminaires designated as winners be ENERGY STAR compliant.

We have the following comments regarding Version 1.0, Draft 1:

The ALA appreciates the EPA's fine work in organizing and consolidating stakeholder input prior to the development of V. 1.0, Draft 1. We agree with the general approach that has been developed for ENERGY STAR qualification of residential luminaires.

Our overarching concern is the increasing cost and complexity of the ENERGY STAR compliance qualification process, and verification testing for residential luminaires. This process must be kept simple and affordable for residential luminaire manufacturers and easy for users to understand in order to continue the growing use of ENERGY STAR luminaires in homes and, particularly, as replacements for existing less energy-efficient luminaires.

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We understand the need to properly qualify and verify luminaire energy-saving performance; but we also believe that the performance of most residential luminaire types can be determined without extensive and more-expensive third-party testing. Because of the large number of competitively-priced residential luminaire types demanded by and already existing in the market, qualification and testing costs will determine, in large part, the number of ENERGY STAR luminaire types available and competing with non-ENERGY STAR products. Only by having an increasing number of ENERGY STAR luminaires in use will lighting energy savings actually result.

Most of the luminaires in homes are what ENERGY STAR has designated "non-directional" and so energy efficiency can be determined by simple visual inspection and the use of an ENERGY STAR lamp/ballast combination or integral lamp. The ENERGY STAR qualification and verification processes should take advantage of the simplicity and inherent low cost involved in such an inspection process.

Accordingly, we support the proposed use of manufacturer data as an acceptable source of documentation for certain lamp and luminaire performance characteristics.

And, we support manufacturer testing, with appropriate laboratory certification, as an acceptable source of required qualification and verification data.

The current ENERGY STAR luminaire qualification process uses a "platform" approach for certain energy-efficient lamp/ballast combinations. We understand that the ALA/NEMA lamp/ballast matrix is "under review" with the objective of improving it. The matrix has proven to be a simple and cost-effective way for our members to qualify luminaires for ENERGY STAR and we strongly support its continued use and development.

We agree with the use of "directional" and "non-directional" as a way to recognize and classify the fundamental differences between functional and decorative residential luminaire types and appreciate the attention given to this issue.

The ALA remains ready to further assist ENERGY STAR in this important effort. Please contact Terry McGowan, ALA Director of Engineering, at 216-291-1884 or lighting@ieee.org with any questions regarding these comments.