



October 23, 2008

Alex Baker
US Environmental Protection Agency
Ariel Rios Building 6202J
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Richard Karney
US Department of Energy
1000 Independence Avenue SW, EE2J
Washington, DC 20585

Dear Mr. Baker and Mr. Karney:

The Consortium for Energy Efficiency (CEE) respectfully submits the following comments in response to EPA communication of September 22, which proposed next steps for version 4.2 of the Residential Light Fixture Specification. CEE's continuing interest is in having an effective ENERGY STAR Program that includes Solid State Lighting (SSL), and therefore our comments are addressed to both EPA and DOE. CEE's previous comments on ENERGY STAR SSL stand and are supplemented by this letter.

The following comments, which were developed by the CEE Lighting Committee (Committee), are supported by the organizations listed below.

Overarching Comments on Program Coordination

CEE is the bi-national organization of energy efficiency program administrators and a staunch supporter of the ENERGY STAR Program. CEE members are responsible for ratepayer-funded efficiency programs in 34 U.S. states and 5 Canadian provinces. In 2008, CEE members directed 83 percent of electric budgets and 90 percent of gas budgets in the two countries. In short, CEE represents the groups that are actively working to make ENERGY STAR the relevant platform for energy efficiency across North America.

CEE members highly value the role ENERGY STAR plays in differentiating energy efficient products and services that they support locally. For ENERGY STAR to effectively play this role, we believe it is critical that there is consistency across products and services regardless of the managing agency. CEE members need ENERGY STAR to develop and convey consistent messages to stakeholders and to speak with one voice.

As we noted in previous comments, there are conflicting specifications for ENERGY STAR lighting. These include specifications for directional SSL applications (Category "A"), general illumination products (Category "B"), and decorative products (RLF, v. 4.2). We have raised concerns about multiple SSL specifications because they hinder members' use of ENERGY STAR in their promotional activities. For example, given the multiple specifications currently in place, members cannot be assured that products with the ENERGY STAR label will have equivalent performance. As a result, some CEE have members are considering promoting a sub-set of SSL products with a qualified products list instead of using their preferred approach of promoting all ENERGY STAR labeled products. This program design diminishes the emphasis on ENERGY STAR and

complicates messaging to consumers. We look to EPA and DOE to resolve these issues as soon as possible with the goal of enabling greater promotion of ENERGY STAR SSL.

Technical Comments on the Incorporation of SSL into ENERGY STAR

We continue to emphasize that our greatest need is for a unified ENERGY STAR lighting program that accommodates the emergence of solid state light sources. CEE members have also considered the specifications proposed by EPA and DOE and have developed technical comments. Though EPA responded to our previous technical requests by incorporating limited CCTs and minimum light output requirements in indoor applications, several technical concerns from previous comments remain and are summarized briefly again below.

Program Scope

It is CEE's understanding that the strength of LEDs is in their focused and directional nature. In the absence of evidence that now is the appropriate time to begin covering non-directional light sources, we recommend that the ENERGY STAR program scope be limited to applications that take advantage of LEDs' "directionality." Further, CEE seeks from ENERGY STAR a detailed rationale including demonstrated evidence of suitable product performance for the newly proposed Category "A" applications. CEE also asks ENERGY STAR to evaluate the near-term opportunity to include refrigerated case display lighting within the scope of the program.

Definitions

To eliminate ambiguity, we recommend that ENERGY STAR develop a clear and precise definition that outlines which applications meet the "directionality" criteria so that all stakeholders understand what is, and is not, covered at this point in time. CEE also asks ENERGY STAR to clarify the program scope by developing precise definitions that outline the specific fixture types that are covered under each general application title.

Efficacy

In the near term, CEE believes that luminaire efficacy should be used for all SSL light fixtures. We recognize that luminaire efficacy may not be feasible or meaningful for purely decorative products, and we look to ENERGY STAR to engage all stakeholders in determining the appropriate time and method for including decorative products in the program.

Test Procedures

CEE has commented in the past that finalized, standardized, industry-accepted test procedures are a prerequisite for inclusion as a basis for the ENERGY STAR program. Industry standardized procedures provide credibility to the program, help to ensure consistent and repeatable test outcomes, and are the basis for third-party testing by National Voluntary Laboratory Accreditation Program (NVLAP) certified laboratories.

Minimum Light Output

Regarding the Minimum Light Output requirements for the proposed expanded Category "A" applications, CEE reiterates its request that ENERGY STAR further consider the

requirements for outdoor fixtures and to consider variations in lumen depreciation when benchmarking SSL against other technologies.

Warranty

CEE asks ENERGY STAR to consider the feasibility of increasing warranty and lifetime requirements for outdoor applications covered under the specification. This suggestion is based on our understanding that most outdoor fixtures will be operating at lower temperatures and that compact size is less important for most outdoor products (leading to greater thermal mass and the potential for better heat management).

Thank you for your consideration of these comments. Please contact CEE Senior Program Manager Rebecca Foster at (617) 589-3949 ext. 207 with any questions.

Sincerely,



Marc Hoffman
Executive Director

CC: Kathleen Hogan, EPA
David Rodgers, DOE
Jim Brodrick, DOE

Supporting Organizations

Avista
BC Hydro
Cape Light Compact
Efficiency Vermont
Idaho Power
Long Island Power Authority
Northeast Energy Efficiency Partnerships
National Grid
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PacifiCorp
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