

VIVA Green Lighting Comments on ENERGY STAR Program Requirements for Residential Light Fixtures Draft 1 Eligibility Criteria – Version 4.0

As an Energy Star Partner, VIVA Green Lighting would like to input the following suggestions and ideas towards Version 4.0 of the Eligibility Criteria for Energy Star Requirements for Residential Lighting Fixtures.

- 1) Lumen Maintenance: The draft currently states 80% lumen maintenance at 40% of life which means a lamp with life of 10,000 hours will require 4000 hours or 167 days (almost 6 months) of test data. **VIVA suggests that an earlier qualification method be developed to enable manufacturers to bring to market Energy Star compliant ballast faster, such as a 1000 hour lumen maintenance requirement.**
- 2) Maximum Ballast Case Temperatures: The draft states temperature must be less than or equal to 75C. UL requires 90C for safety. Virtually any ballast installed in an enclosed fixture will have case temperatures over 75C. **VIVA suggests maximum ballast case temperatures follow UL standards.**
- 3) Two-way high/low: **We suggest the addition of two way ballast specifications.**
- 4) Group Control Ballast:
 - The EOL requirement is designed to shut off the ballast when there is a failure in the lamp. This is an undesirable result in instances when a single ballast drives multiple lamps (up to six). Replacement lamps fail at different times, and a Group Control Ballast needs to keep operating the other lamps when one PL lamp fails. This helps consumers identify which failed lamp to replace, preventing consumers from either replacing all the lamps in a fixture (usually a chandelier or vanity bar) or doing elaborate tests to determine which lamp out of the possible six needs to be replaced. **VIVA suggests that any ballast that drives two or more lamps (Group Control Ballast) be exempt from the current EOL requirement.**
 - The lumen per watt requirement per lamp should not be applied to a Group Control Ballast. The draft assumes that the listed wattage on a ballast is dedicated to a single light source, i.e. one PL lamp. However this is not the case for a Group Control Ballast. A ballast that drives three 13W PL lamps will have listed wattage of 36W, requiring efficacy to be at 60LPW. This is an unfair requirement since the light source, or PL lamp, is 13W. **VIVA suggests that any ballast that drives two or more lamps (Group Control Ballast) be exempt from the 60LPW efficacy requirement.**