

August 25, 2008

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

Dear Mr. Baker

Thank you for the opportunity to comment on the RLF 4.2 revision. Wisconsin Energy Conservation Corp (WECC) is extremely concerned about EPA's recent announcement of the revision to the Residential Light Fixture criteria to include LED performance metrics that do not align with the draft criteria for ENERGY STAR<sup>®</sup> program for SSL that has been planned for launch in late September by the Department of Energy.

WECC is dedicated to ensuring consumers are provided with high quality, affordable opportunities to increase their energy efficiency. To accomplish these goals, WECC assists utilities and governmental organizations with the development and effective delivery of coordinated, comprehensive programs that work through local market providers to transform markets to a higher level of efficiency. The company currently manages projects for over seventy utility clients in nine states.

Our partnership with ENERGY STAR<sup>®</sup> has historically been an important component of our program suite and has included an open process and opportunity for public review and comment regarding changes. This process has allowed us, as a program, a greater confidence when promoting ENERGY STAR<sup>®</sup> products in the marketplace. Your recent announcement was unexpected and because it did not solicit the input of market actors and national lighting industry associations, it creates several immediate issues that will result in our inability to promote many of the products that will fall under this specification.

As a member organization of the Consortium for Energy Efficiency, we participated in the development of and fully support the letter sent by CEE July 2, 2008 indicating our concerns with the revisions. While we understand that manufacturers of decorative residential fixtures are eager to participate in the development of products that contain LED light sources, we believe that the specification as written will not be sufficient to ensure the integrity of the ENERGY STAR<sup>®</sup> brand and the programs that promote this brand.

Our concerns about the quality of LED luminaires that could carry the ENERGY STAR<sup>®</sup> label as soon as today include the possibility that by allowing immediate qualification of all LED-based fixtures, EPA may be awarding the ENERGY STAR<sup>®</sup> label to products that will not be measured or qualified based on metrics that address lighting quality and performance issues that are essential to consumer satisfaction. As a result, the consumer

may purchase a low-quality product that has the ENERGY STAR® label which could ultimately give them a bad experience and threaten the market acceptance of LED lighting products and confidence in the ENERGY STAR® brand. Consequently, we will be forced to advise our utility and retail partners that we will not be supporting these products.

We have been engaged with DOE throughout their efforts to develop the criteria for the ENERGY STAR® qualification of quality SSL products based on product design that maximizes the directional nature of LED lighting. We view EPA's recent announcement as conflicting, duplicative and counter-productive to the efforts that DOE has accomplished to date with a very large and involved group of stakeholders. Having two specifications for LED luminaires is confusing to market providers, efficiency programs and consumers and will impede market acceptance rather than assist.

WECC is looking to use a comprehensive and rigorous specification for solid-state lighting products; one that will maximize product quality and consumer satisfaction. With these objectives, WECC does not plan to use the currently proposed RLF 4.2 SSL specification developed by the EPA and we urge you to step back and reassess your position in light of these concerns and suspend the RLF 4.2 specification. With input of market actors and national lighting industry associations, a revised specification could be drafted to address many of the concerns we and other energy efficiency organizations have with RLF 4.2.

Very sincerely,

Sara Van de Grift  
Director of Residential Programs

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Lighting Program Manager