

March 13, 2018

US Environmental Protection Agency  
ENERGY STAR Lighting Program  
Attention: Taylor Jantz-Sell, Program Manager  
Re: ENERGY STAR Luminaires V2.1 Specification Draft

Submitted via email: [jantz-sell.taylor@epa.gov](mailto:jantz-sell.taylor@epa.gov)

**Acuity Brands Additional Comments on ENERGY STAR Luminaires V2.1 Specification Draft**

Dear Ms. Jantz-Sell,

Thank you for the opportunity to participate in the development of the ENERGY STAR Luminaires Specification. Acuity Brands offers the following additional comments regarding the specification proposals in Luminaires V2.1 Specification Draft:

**Shipping with ENERGY STAR Certified Lamps:** There are significant discrepancies between the Luminaire program (specification) requirements of an integrated light sourced directional luminaire and a directional luminaire shipped with an ENERGY STAR certified lamp. These discrepancies can result in compromised performance, reliability, and safety. For example, lumen maintenance and source life requirements (10.1 and 10.2) are defined as 25,000 hours for indoor and 35,000 hours for outdoor. The ENERGY STAR Lamp program requirements only require 15,000 hours for a certified lamp. Lumen maintenance calculations are also different with respect to how the temperature of the light source is determined for the recessed directional luminaire. For lamps, UL 1993 is used; while for luminaires, UL 1598 is used. Test apparatus for UL 1993 does not necessarily represent the fixture size of applications in UL 1598. UL 1598 applications can be smaller than 6-inch diameter, increasing temperatures and lowering life of the sources. Section 13.1 is required for thermal performance of certified lamps, however this only addresses "ballast or driver case temperatures," and does not provide any data on the light source. The industry has no convention to identify the TMP location or acceptable thermal limit of a lamp. Neither current ENERGY STAR standards nor UL 1993 adequately measure the performance, reliability, or safety of a specific luminaire/lamp combination.

**Recommendation:** Remove from the proposal the option of certifying directional and non-directional luminaires as ENERGY STAR when luminaire is provided with ENERGY STAR lamps.

Please contact me if you would like to discuss our comments in more detail.



Tanya Hernandez, PE, LC  
Acuity Brands, Inc.  
Director, Government & Industry Relations  
770-860-2793  
[Tanya.Hernandez@AcuityBrands.com](mailto:Tanya.Hernandez@AcuityBrands.com)