



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

Acuity Brands 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 comments regarding the specification proposals in Luminaires V2.1 Specification Draft:

Effective Date for Reporting Flicker Metrics: Using NEMA 77 to meet temporal light modulation limits is proposed as optional in the V2.1 (point revision), however the reporting of Pst and SVM is proposed as a requirement with an effective date of June 1, 2018. NEMA 77 is relatively new, and is anticipated to add cost in qualifying products in terms of equipment, time, and testing resources. Products on the immediate roadmap or currently in the development pipeline will now require additional testing to provide the PST and SVM data.

Recommendation: Revise the effective date for reporting flicker metrics using NEMA 77 to June 2019 to allow manufacturers time to incorporate NEMA 77 test procedures into their product development cycles.

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

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