
From: Engelfried, Jennifer
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To: lighting@energystar.gov
Subject: ENERGY STAR Lamps V2.0 Draft 1 Comments

Batteries Plus Bulbs Comments – Lamps V2.0 Draft 1

- Changes are happening too quickly, we just had a major overhaul of the spec that went into effect in 2014 – we need more time, there is too much maintenance that needs to be done when specs change whether it requires re-testing, changes to packaging, or items no longer qualifying and thus needing to be removed from Energy programs. We had major problems when specs changed with V1.0 in September with commercial projects that weren't officially closed by 9/30/14 and trying to get reimbursed for those projects with utilities not honoring the archived list.
- The new lamp efficacy requirement that are being suggested will largely eliminate the majority of CFL products that are currently on the ES list, this would again be a major change similar to the 9/30/14 change when all items had to be re-tested. As a retailer and brand owner, this requires significant time and energy to first see if product changes can be made to meet requirements, then change artwork if applicable and lastly work with all the utility companies across the country to take off or add products that will/won't qualify for programs.
- Lamp Packaging color nomenclature affects more than just LED and CFL – we have 2700K as soft white across our entire lamp assortment in the store. This would be a major change that we would need to look across every lighting product we carry and would require re-education of all of our associates, this would take much longer than 9 months to implement based on the time it takes to revise packaging and product ordering cycles.

Thank You,

Jenny Engelfried

Batteries + Bulbs

Senior Product Manager • jengelfried@batteriesplus.com

Phone: 262-912-3257 • Fax: 262-912-2217 • 1325 Walnut Ridge Dr., Hartland, WI 53029

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