
From: Ed Boyd Thursday, March 26, 2015 11:45 PM
Sent: Lighting@energystar.gov
To: Nugi; 'jefflong'; Laurie Everett; Scott W Morris
Cc: ENERGY STAR Luminaires 2.0 Draft 2 Comments
Subject:

Dear ENERGY STAR Luminaires Program,

Please accept this email as our formal comments in response to the ENERGY STAR Luminaires V2.0 Draft 2 Specification. Bright International Group is a manufacturer of ENERGY STAR, LED & fluorescent, flushmount luminaires for The Home Depot. The products are private-labeled under Home Depot's **Hampton Bay**, **Commercial Electric**, and **Home Decorators Collection** brands.

We have reviewed the Luminaires V2.0 Draft 2 spec and had a representative listening on last week's webinar. After consulting with our fixture buyer at The Home Depot, we would like to share our strong opposition to the proposed new screwbase lamp option for qualifying ENERGY STAR Luminaires, particularly flushmount ceiling fixtures (aka Bulb-in-the-box). We feel that flush mounts should be out of scope entirely. They are not classified as directional luminaires, but since they are used as primary light source in applications, it seems that they should be considered similarly to directional luminaires which is out of scope for bulb in a box. Both Bright and Home Depot oppose this proposal for the following reasons:

Less Attractive – Using flushmounts as an example, manufacturers that ship one or more screwbase ENERGY STAR A-lamps with a flushmount fixture will have significantly more hot spots and dark spots than manufacturers using hardwired flat engines mounted to the pan of the fixture. One or more horizontal A-lamps (incandescent, fluorescent, or LED) create hot spots and dark spots that will be less attractive than flat LED engines hardwired to the fixture pan. This scenario plays out in other luminaire types, such as sconces, close-to-ceiling, ceiling fan light kits, and some bath vanities. Bulb-in-the-box will reduce the appearance of ENERGY STAR Luminaires in a significant way.

Reduced Output And Higher Energy Usage – Horizontal A-lamps screwed into fixtures, such as flushmounts, are far less efficient at getting light out of the fixture than a flat LED engine hardwired to the pan of the luminaire. With roughly half of a screwbase lamp's light directed back into the luminaire, even a reflective pan will direct light back into the A lamps, themselves, reducing light output and fixture efficiency. The fixture will then either be sold with lower lumen output, or higher wattage lamps will be used, directly increasing the energy usage of the luminaire, unnecessarily. Lower fixture efficiency and higher power consumption are the opposite of what ENERGY STAR should be working toward.

Reduced Reliability – LED screwbased lamps are far less able to dissipate heat than LED engines thermally-mounted to an aluminum pan of the luminaire. Utilizing the thermal mass of the luminaire housing is an important strategy to improve LED performance in fixtures. ENERGY STAR should be promoting

better thermal management of LED fixtures, rather than proposing medium base sockets as the thermal management of ENERGY STAR LED luminaires.

Reduced Utility Rebates – The history of ENERGY STAR Luminaires and before that ENERGY STAR Fixtures, has always been to create permanent energy efficient fixtures that prevent the possibility of “snap-back” to low-efficacy light sources. This is why some utilities have offered significant rebates on ENERGY STAR Luminaires. The proposal to allow screwbased lamps as a compliance path will reduce or eliminate the utility motivation to promote ENERGY STAR Luminaires. Why couldn’t a consumer purchase an ENERGY STAR luminaire with LED lamps included, and later replace them with halogen lamps, for any number of reasons? Utility rebates directly fuel demand for ENERGY STAR Luminaires and the reduction or elimination of fixture rebates will reduce ENERGY STAR market share and energy savings attributable to the program.

Home Depot and Bright’s concerns are that bulb-in-the-box will initiate a new ‘race to the bottom’ by providing a new, lowest cost option with all of the drawbacks detailed above. Even responsible fixture manufacturers will be forced to compete using the bulb-in-the-box compliance path, damaging the program and consumers, as described above. We have experienced dramatic success with integrated LED ENERGY STAR flushmount ceiling fixtures. Consumers are adopting these fixtures at a rapid rate and the customer online reviews and comments on these fixtures are extremely positive. Consumers are choosing our new integrated LED ENERGY STAR flushmount ceiling fixtures over typical incandescent fixtures and we feel that not only energy savings, but appearance, light quality, reliability, projected life, and overall performance are critical factors in their decision. I respectfully request that EPA remove the bulb-in-the-box proposal from Draft 3 of the Luminaires Specification, in the interest of all ENERGY STAR Luminaire stakeholders.

Thank you for your consideration,

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