

**From:** Emily A. McGraw <Emily.McGraw@cmsenergy.com>  
**Sent:** Monday, November 23, 2015 5:57 PM  
**To:** lighting@energystar.gov  
**Cc:** JOSEPH A. FORCILLO; Theodore A. Ykimoff  
**Subject:** Consumers Energy Comments on ENERGY STAR Specification for Lamps DRAFT 3 (+ Interim Proposal)  
**Attachments:** ENERGY STAR Lamps v 2 0\_DRAFT3plusInterimProposal\_CLEARResultComment\_11-2....pdf

To Whom it Concerns:

Consumers Energy would like provide our support for the attached comments provided by our ENERGY STAR Lighting and Appliance Program Implementation Contractor, CLEARResult.

The proposed v2.0. ENERGY STAR specification changes that will go into effect in 2017 pose a substantial risk to the delivery of our residential lighting programs, specifically the new specification:

- Excludes all CFLs from being ENERGY STAR certified
- Impacts our 2017 residential program filing that include low cost, efficient CFL products
- Significantly impacts our ability to achieve our 2017 energy savings goals within our filed budgets

Additionally, to achieve savings goals, we may be forced to promote non-ENERGY STAR value line LEDs and are concerned this would significantly weaken the value of the ENERGY STAR brand in the lighting market.

We reiterate our support of the CLEARResult comments and advise ENERGY STAR to seriously consider the proposed recommendations.

Thank you for the opportunity to comment on this specification revision

Sincerely,

**Emily McGraw**  
Smart Energy Efficiency Solutions – Program Manager

O: 517-768-5450 | C: 517-740-5910

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**From:** Seth Craigo-Snell [mailto:seth.craigo-snell@clearesult.com]

**Sent:** Monday, November 23, 2015 5:23 PM

**To:** Nathalie Osborn

**Subject:** FW: Comments on ENERGY STAR Specification for Lamps DRAFT 3 (+ Interim Proposal)

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**From:** Seth Craigo-Snell

**Sent:** Monday, November 23, 2015 4:52 PM

**To:** 'lighting@energystar.gov'; 'jantz-sell.taylor@epa.gov'

**Cc:** Stanley Mertz; Peter Feroli; Joseph Moleski; Gary Elliott

**Subject:** Comments on ENERGY STAR Specification for Lamps DRAFT 3 (+ Interim Proposal)

Taylor:

Attached are CLEAResult's Consumer Products Services comments on the ENERGY STAR Specification for Lamps DRAFT 3 (+ Interim Proposal). If you have any questions on our comments or would like additional information, please don't hesitate to reach out to us.

Regards,  
Seth Craigo-Snell

**Seth Craigo-Snell, Ph.D.**

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