



*Powering Business Worldwide*

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### **Eaton Comments on ENERGY STAR® Luminaires Specification v2.0 Draft 2**

Eaton is a leading diversified, global power management company that is fundamentally committed to helping the world to use less energy and to use energy safely. Eaton's Electrical Products and Services businesses are global leaders in power distribution, power quality, control and automation, power monitoring, and energy management products and services. We deliver a range of innovative and reliable indoor and outdoor lighting and controls solutions specifically designed to maximize performance, energy efficiency and cost savings. The Lighting business serves customers in the commercial, industrial, retail, institutional, residential, utility and other markets. Eaton is a global leader in efficient lighting solutions and a major stakeholder in the electrical industry.

Eaton appreciates the opportunity to provide the comments below in reference to the proposal

#### **General**

While we understand the concept that eliminating the "Commercial" designation and combining the categories may simplify the market, we feel removing "commercial recessed" is a concern and feel the market will not understand this. We recommend keeping the requirements calling out commercial recessed.

We strongly oppose the use of ENERGY STAR® lamps in enclosed luminaires to achieve ENERGY STAR® certifications. This would be true for recessed downlights with ENERGY STAR® lamps if allowed in ENERGY STAR®.

- a. The performances of an ENERGY STAR® integrated luminaires have stricter requirements than those with ENERGY STAR® lamps and enclosed luminaires. Understanding this specification is considered to be technology agnostic, the conditions must be the same or preferential treatment is being made for the lamp industry by ENERGY STAR®.
- b. UL has not addressed the conditions of suitability of ENERGY STAR® lamps in luminaires. Our own testing shows that warranties and UL conditions of suitability for the lamp are not being met. ENERGY STAR® is setting the stage for un-safe conditions.
- c. The use of a socket in an ENERGY STAR® enclosed luminaire does not distinguish performances that are appropriate for performances and safety. The lamp shipped with the ENERGY STAR® luminaire might indeed pass the already lowered performance requirements currently proposed but there is no mechanism in the industry to prevent miss-use causing most importantly unsafe conditions and lastly correlation of what is proper when a lamp replacement is used.

In the current draft, ENERGY STAR® addresses MR16 lamps but does not allow MR16 retrofit kits. We propose that MR16 retrofit kits be included in ENERGY STAR® using a reference low voltage transformer for the base testing and allow the use of the GU10 style socket operating at 50 LPW.

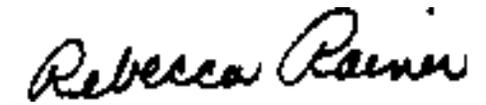
## **Section 9.2**

ENERGY STAR® should reconsider the Luminaire Zonal Lumen Density Requirement for Downlights with Wall-wash optics. The  $\geq 75\%$  in 0-60deg zone prevents a recessed downlight from meeting the requirements as an integrated solution.

## **Section 9.5**

Color over angle requirement needs to be revised to 0.006 (DUV). The current requirements do not take into consideration the way the technologies are being deployed today.

Thank you for your consideration of the above comments and we look forward to working with you on this project.



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