



GE Lighting

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Via e-mail: lighting@energystar.gov.

January 29, 2015

Ms Taylor Jantz-Sell
Environmental Protection Agency
Energy Star Lighting Program Manager
1200 Penn, Ave NW 6202J
Washington, DC 20460

Re: **GE Lighting Comments on ENERGY STAR Program Luminaire specification V2 draft 1**

Dear Ms. Jantz-Sell,

GE Lighting appreciates the opportunity to comment on draft 1 of Luminaires V2.0. Ge supports the overall effort of updating the luminaire spec to higher efficiency levels while allowing for new technologies like color tuning and connected products to be included.

Please find below comments regarding the V2.0. Ge looks forward to working with the EPA on the development of the new luminaire specification and if further discussion is needed regarding comments below or other questions please feel free to contact me directly.

Sincerely,

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Section 5.1 Testing Tunable Luminaires

The current draft shows that testing will need to be completed at “the least efficient setting within ANSI white light CCT ranges”.

Q: Is the intent of the specification to target the center point of the ANSI bin, the defined limits for the ANSI bin, or a specified tolerance around the center point when testing the luminaire?

It is important to clarify what the target will be to ensure that it can be achieved in practice by the luminaire.

Section 9.3 – CCT for Solid State luminaries.

The current specification only list out 5 CCT’s that are contained within ANSI c78.377 2008. The standard is currently under revision and will have more standard color points listed that will be of interest to consumers depending on application. GE believes the verbiage could be updated to include future revisions:

“at least one of the following nominal correlated color temperatures (CCTs) or specified center point within the reference document.”

Section 15– Control Requirements: Luminaires employing any control Mechanism

1) Section 15.2.3

Q: What is a consumer authorized entities as described in the section? Are there specific industry standard protocol or procedures that the manufacturer will need to be following to ensure compliance to interconnecting with authorized entities?

Based on the current status and activity in this area of technology it would seem to be a better idea to specify that the device/interface have this information until standards can be developed regarding the communication between the connected device(s) and “outside” entities.

2) Section 15.2.4

3)

Q: Is there a list or industry specification for the interface for “energy management systems”?

Ge is not aware of a standard protocol and believes the intent of this section is to ensure that the connected product can signal to the user the connected product’s status through authorized means (ie cell phone, ipad, etc.) The way it is written today, GE’s impression is that the energy management system is mandatory (the word choice of “and” versus “or” as shown in section 15.2.5)

GE recommends that the section wording be updated to: *At a minimum, the product shall be capable of providing the following information to consumer authorized devices, services or applications via a communication link:operational status; e.g. on/off, and luminous intensity*