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Juno Lighting Group (JLG) appreciates the opportunity to provide input and comments regarding Energy Star Luminaires V2.0. Please see our comments below related to their respective subject.

1. Color Angle Uniformity: JLG would support revising the requirement to relax the current luminaire requirement to match the current Energy Star lamp requirement.
2. Start time: JLG would support eliminating this requirement from Energy Star. This can be managed in our own specs.
3. Zonal Lumen Density: JLG would advocate that Energy Star eliminate this entirely. The end user should decide if the light distribution meets their needs. Subdividing and adding more categories is not the solution to varied user needs; eliminating the requirement is.
4. Raising Efficacy: JLG supports raising efficacy requirements to match current technology, but consideration should be given to support designs for quality of light; such as, but not limited to, high CRI and cut off angle provided by optical control and source regression. Considering only efficacy without a balanced view will only encourage less desirable lighting solutions. One reason that downlight retrofits has a higher efficacy than recessed downlights is that the improvements cited above are often incorporated into recessed downlights and not into retrofits. There is a definite tradeoff between quality of light (including aesthetics) that these improvements provide and efficacy. A possible consideration would be to create a new category for high quality lighting, such as precision recessed lighting. If a tier approach is being considered (such as a new efficacy becomes affective on a future date), a review should be required before the official release of the planned efficacy increase. This will ensure that technology has indeed kept up to projections, as past predictions have proven difficult to hit.
5. New and Expanded Product Types: JLG would support considering other product types for Energy Star, including color tunable and tunable white luminaires.
6. We DO NOT support a certification path, or the creation of a category that would permit Energy Star Certified screw-in bulbs to ship with essentially an incandescent Luminaires. We do not understand how this would streamline product certification, as claimed in the discussion document.
 - a. Given the large number of Energy Star lamp manufacturers, it would be a monumental task to test/qualify various luminaires for different applications to various lamp manufacturers.
 - b. Who must honor the warranty? Who declares suitability of the combination? Why are people not content with the current Energy Star lamp program?
 - c. The channels to market are another obstacle to this approach. I may have one distributor who sells my luminaire and is also a GE lamp distributor. I may have another distributor who sells my luminaire and is a Philips lamp distributor. It is the distributors who value the flexibility to provide the lamp they are franchised to sell with my luminaire. It is also difficult and costly for a luminaire manufacturer to package a lamp with a fixture; we learned this first hand with CFL's. Additionally, lamps are not typically

installed at the same time as the luminaire. This leads to damage and control issues with the various lamps waiting to be installed.

- d. The Energy Star luminaire and lamp programs should remain separate, as ease of bulb replacement is already being addressed with the lamp program.

JLG looks forward to the initial draft of Energy Star Luminaires V2.0 and being an active participant in the finalization of the spec.