

ENERGY STAR LUMINAIRES SPECIFICATION VERSION 2.2 DRAFT COMMENT SUMMARY AND EPA RESPONSE

Section	Topic	Subtopic	Comment	Response
1.1	Excluded Products		Considering an existing FAQ, one stakeholder requested that EPA clarify the exclusion of "luminaire types typically employed for general office illumination such as linear pendants and panel lighting" noting that the word "panel" currently appears in the QPL listing of over 100 models.	EPA reminds stakeholders about the following lighting FAQ, however changing the specification exclusion language must wait until the next major (V3.0) revision: https://energystar.zendesk.com/hc/en-us/articles/360002914311-What-distinguishes-a-troffer-or-panel-light-that-is-excluded-from-the-scope-from-a-decorative-ceiling-surface-mount-light-that-uses-a-side-lit-or-backlit-panel-
1.1	Excluded Products	Fixtures with Integral Battery Packs	One brand owner partner asked if additional ENERGY STAR testing is required for fixtures with integral battery packs.	EPA did not identify any necessary additional testing requirements for the inclusion of fixtures with integral battery packs.
1.2	Included Products	Inseparable Other SSL Luminaire	One brand owner partner requested additional clarification on the difference between an Inseparable Luminaire and an Inseparable Other Luminaire.	<p>The light source(s) within a solid-state luminaire may be:</p> <ul style="list-style-type: none"> ● Separable (i.e. replaceable by the consumer without the cutting of wires or the use of solder); or ● Inseparable (see Inseparable Luminaire definition in Section 4). <p>All directional luminaire types listed in the following table, whether separable or inseparable, are to be evaluated using luminaire photometry.</p> <p>Non-directional luminaire types listed in the following table with:</p> <ul style="list-style-type: none"> ● Separable light sources are to be evaluated using source photometry; or ● Inseparable light sources are referred to as "Inseparable Other SSL Luminaires" in this specification and are to be evaluated using luminaire photometry.
5.1	Testing Color Tunable Luminaires		One brand owner partner recommended that all tests and evaluations of color tunable luminaires be performed on the most consumptive (i.e., rather than the least efficient) white light setting (I.e. to align with the Lamps specification).	EPA would like to align this requirement with the Lamps specification but must wait until the next major (V3.0) revision.
6.1	Product Families	Ballast/Driver Variations	One stakeholder indicated that the stated additional test data required for each ballast/driver variant may be too lenient.	<p>Ballast/driver variations are allowed so long as they "do not negatively impact (the) luminaire's compliance with any performance criteria" in the specification.</p> <p>If a lab or CB believes that a variation may negatively impact compliance, at their discretion, they may recommend additional testing to partners.</p>
6.1	Product Families	CCT Variations	One stakeholder recommended changing "discharge products" to "fluorescent products" in the variation description.	The general term "discharge" is still inclusive of fluorescent and is likely a carry-over from previous specifications that covered other discharge sources (e.g. HID).

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9.3	Correlated Color Temperature		One brand owner partner suggested that EPA allow the certification of luminaires that fall within one of five 'extended' quadrangles (i.e. 2700/012, 3000/012, 3500/012, 4000/012, or 5000/012) defined by the ANSI Extended Nominal CCT Specification as shown in C78.377-2017, Annex E.	EPA is interested in expanding scope to add these nominal CCTs based on research supporting consumer preference. To better understand the current market for these products EPA invites input on this scope expansion from other suppliers and will consider this for a future revision.
9.4	Color Rendering Index	R9	One brand owner partner suggested that the R9 >0 requirement be changed to R9 > -5.	EPA will continue to explore the new metrics for color fidelity (e.g. based on R _f rather than R _a) and color gamut (e.g. based on R _g rather than R9) and potential changes to the ENERGY STAR requirements as part of the next major (V3.0) revision.
10.2	Solid State Light Source Life		One stakeholder asked whether Inseparable Other and directional luminaires with inseparable light sources are subject to the L ₇₀ ≥ 50,000 hours requirement.	The 50,000-hour minimum L ₇₀ lumen maintenance life requirement applies to all luminaires with inseparable light sources.
11.4	Transient Protection		One brand owner partner suggested that EPA permit luminaire manufactures to submit the driver/ballast transient test results as proof of meeting this requirement in lieu of luminaire-level testing currently required.	EPA may consider this proposal for the next major (V3.0) revision.
11.5	Standby Power Consumption	External Power Supply (EPS) Exceptions	One stakeholder provided three potential configurations of desk task light, EPS, and USB charger ports and requested clarification about the applicable EPS exception for each.	Wherever an external power supply (EPS) enables USD charging functionality it must meet the level VI or higher performance requirements under the International Efficiency Marking Protocol and include the level VI or higher marking.
11.7	Flicker	P _{st} and SVM	One stakeholder asked if EPA plans to set P _{st} and SVM limits for ENERGY STAR certification	EPA has not established a timeline for setting P _{st} and SVM limits and has no new information from which to do so.
13.1	Driver Case Temperature	LED Driver Case Temperature Measurement Point (TMP _C)	One stakeholder asked how TMP _C should be defined for subcomponents where the LED driver and light source(s) are integrated on the same board.	The manufacturer must designate TMP _C . Section 4 of the Luminaires V2.2 specification defines TMP _C as the "location on an LED driver case, designated by its manufacturer, which will have the highest temperature of any point on the driver case during normal operation."
15.1	Dimming	Step Dimming	One stakeholder asked if a luminaire offering step dimming from 100% to 20% could be marketed as dimmable.	For the purposes of ENERGY STAR certification, only luminaires offering continuous dimming may be certified and marketed as "dimmable" . EPA has a different level of expectation for continuous dimming than for step dimming as outlined in the requirements. There are no specific requirements for step dimming; it is an additional feature that partners are required to disclose. If offered, EPA's expectation is that they be clearly marketed as step dimming.

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	QPX	Model Names and Numbers	One stakeholder requested exact definitions of Model Name and Model Number that is required for submission, specifically addressing partner use of additional characters indicating, for example, multi-packs or tracking manufacturing suppliers.	Partners self-select the name/number of each certified model. If the certified model is part of a model family, they are expected to include the family model name/number. One way to handle characters that vary within a family (e.g., indicating multi-packs or tracking manufacturing suppliers) is with the use of a wildcard, so long as it meets the wildcard requirements described on page 8 of EPA's ENERGY STAR Qualified Products Exchange (QPX) XML Transaction System Documentation: https://www.energystar.gov/sites/default/files/asset/document/XML_Submission_System_Technical_Documentation.pdf
	QPX	Product Categories	One stakeholder suggested that adding dual categories (e.g. "Recessed Downlight and SSL Retrofit" and "Porch Mount and Pole Mount") on the submission form would be beneficial for certification to avoid duplication of submissions.	EPA has updated the Qualified Product Exchange form to allow for this.