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Vice President

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VIA EMAIL TO: lighting@energystar.gov

Ms. Taylor Jantz-Sell
Energy Star Lighting
Environmental Protection Agency
1200 Pennsylvania Ave., MC 6202J
Washington, DC 20460

ENERGY STAR® Lamps 2.0 Draft Final Comments

Dear Ms. Jantz-Sell,

Thank you for the opportunity to review and provide comments on ENERGY STAR® Program Requirements for Lamps Version 2.0 Draft Final. These comments are submitted on behalf of Lutron Electronics Co., Inc.

As you may know, Lutron was founded in 1961 and is headquartered in Coopersburg, Pennsylvania. From dimmers for the home, to lighting management systems for entire buildings, the company offers more than 17,000 energy-saving products, sold in more than 100 countries around the world. In the U.S. alone, Lutron products save an estimated 10 billion kWh of electricity, or approximately \$1 billion in utility costs per year. The company's early inventions— including the first solid-state dimmer invented by Lutron's founder, Joel Spira—are now at the Smithsonian's National Museum of American History in Washington, DC.

Please find our detailed comments below. We look forward to working with you further on this important project. Please contact Stephen Irving at 610-282-6468 or sirving@lutron.com if you have questions or would like more information on these comments. Thanks again for your consideration.

Respectfully submitted,



Pekka Hakkarainen, PhD
Vice President
Lutron Electronics Co., Inc.

1. Connected Products (Section 12.6 through 12.12)

Thank you for considering our comments and updating the requirements for “Connected” lighting products. The language in the Draft Final standard will ensure customers receive the benefits of connected lighting while still allowing companies to innovate in this young product category.

2. Start Time (Section 11.4)

Lutron appreciates EPA’s willingness to understand the fade-to-on issue as it relates to the start time test method. An FAQ or other interpretative document on this subject will help preserve customer access to high-quality, energy efficient, ENERGY STAR certified lighting products and help ensure consistent interpretations by CBs.

3. Standby Power Consumption (Section 11.7)

EPA has added a new requirement to the Draft Final standard where the standby power consumption of associated equipment needs to be reported. While the concept of looking at the whole system makes sense, the way this requirements has been added may make it difficult to comply.

Lighting products (lamps and luminaires) can utilize equipment manufactured and sold by others as the means of achieving the ENERGY STAR “Connected” required functionality. This equipment may not be available to the CB during testing and the electrical schematics may not be available to the lighting product manufacturer. This is likely a greater problem for luminaires than for lamps (as the connected functionality of a luminaire is often achieved through the driver), but still needs to be taken into consideration as the specs are intended to be harmonized.

Additionally, as the connectivity device is not an ENERGY STAR certified device, design changes may give the illusion of non-compliance.

We suggest that this requirement be eliminated, and considered during the next major revision of the standard where stakeholders will have an opportunity to collaborate on a robust requirement.