

12 September 2017

VIA EMAIL TO: ceilingfan@energystar.gov

Ms. Abigail Daken
ENERGY STAR Program
U.S. Environmental Protection Agency
1200 Pennsylvania Ave., NW, MC 6202A
Washington, DC 20460

ENERGY STAR Residential Ceiling Fans 4.0 Final Draft Comments

Dear Ms. Daken,

Thank you for the opportunity to review and provide comments on EPA's ENERGY STAR Residential Ceiling Fan Specification 4.0, Final Draft. 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 Steve 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.



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

cc: Taylor Jantz-Sell, EPA
Lucy deButts, DOE

1. Flicker and Dimmer Compatibility (Section 3.2.3)

Thank you for considering earlier comments provided by Lutron and by the ALA, and for updating the requirements for flicker and dimmer compatibility. Lutron agrees with the change that all CFLKs should be tested for flicker, not just those that are dimmable. Lutron also supports the requirement that CFLKs that are compatible with forward-phase controlled dimmers shall comply with SSL 7A.

These basic requirements help to ensure a positive experience for users and will build upon the success of the ENERGY STAR brand. We encourage EPA to consider these same changes in future revisions to the Lamps and Luminaires specifications.

2. Connected Functionality

We support the approach of harmonizing the requirements for Connected Functionality with those in Lamps 2.1. Connected functionality is most useful when implemented across multiple product categories, and therefore it is key for EPA to have consistent requirements and interpretations.

Additionally, Lutron appreciates EPA's continued willingness to describe required functions without prescriptive requirements that would limit innovation.