



MaxLite Comments on ENERGY STAR® Luminaires 2.0 Draft 1

Date: January 30, 2015

Thank you for allowing us to comment on Draft 1 of the ENERGY STAR Product Specification for Luminaires Version 2.0. Please see our comments below:

Directional Classification of Outdoor Lighting

As stated in Draft 1.0, all outdoor products would now be classified as Directional luminaires and therefore subject to full fixture photometry. We strongly support moving a segment of outdoor products, wall-mounted porch lights, to the Non-Directional category. These fixtures are a large part of many of our Partner's decorative lighting portfolio for residential use and requiring these products to undergo full photometry would place a tremendous testing burden on the fixture manufacturers and likely severely limit the participation of many of these manufacturers in the ENERGY STAR program with this type of product. While we realize the primary impetus to requiring fixture photometry for these types of products may be the desire to limit uplight and unnecessary light pollution, allowance of wall-mounted porch lights in the Non-Directional category would greatly expand the amount of products that utilize higher efficiency light sources. Moreover, these types of products are not a major contributing factor to light pollution.

Additionally, in general MaxLite does not support adding full cutoff in this specification as it is a strong limiter in product choice and doesn't offer energy savings. Requirement for cutoff is already addressed via local and state ordinances, and we suggest that this remain the case.

Shipping with ENERGY STAR Certified Lamps – Non-Directional Luminaires

MaxLite supports allowance of Certified lamps to be shipped with non-directional luminaires. However, we support including language in this section that also makes it very clear that fixtures can also be Certified that ship with CSD lamps and engines.

We recognize that there is a sentence that states fixtures can “..meet relevant requirements in Sections 9 through 19,” but we suggest that language be included that clearly states CSD lamps and light sources are a viable path to luminaire certification.

Actually there is no mention of the Certified Subcomponent Database anywhere in this Draft 1.0 document. Manufacturers should be made aware in this document in all instances where LED Light Engines and GU24 lamps are mentioned that product that has been third-party tested to meet the requirements outlined here and is listed on EPA's website.



Also note that in the “Product and Packaging and Labeling” section on P.13, for clarification we suggest revising the following sentence:

~~Unless shipped with lamps directly installed, ENERGY STAR certified lamps shipped with luminaires must comply with lamps packaging requirement.~~

There are no known scenarios where a manufacturer would pre-install the lamps, and including the sentence as written could lead to confusion as to what is required on packaging for the lamps in the box with fixtures.

Other efficient light sources (not a section currently discussed in the draft)

It is our opinion that a number of lamps, not currently able to be Certified under the Lamps Specification would greatly benefit the Luminaires program. In the past year, we have seen enormous interest and growing sales in products that aim to replace high wattage halogen light sources with bases such as G9, Wedge Base, G4, GY6.35, etc. These lamps have tremendous power savings reducing energy usage per lamp from wattages of up to 40W to as low as 5W with LED. Moreover, these LED Halogen replacements are frequently being used in fixtures that contain a high number of sockets. Such products are not currently included in the Lamps specification and as such would not be able to ship with Luminaires under the proposed Luminaire 2.0 “bulb-in-box” changes.

Until a time in which these lamps are added to the Lamps specification, it is our suggestion that these (and any other LED lamp not yet able to be certified) be treated like LED Light Engines (with secondary optics) and included in the sections that reference LED Light Engines as another path to qualification. Moreover, such lamps would be added to the CSD.

Solid-State Surface Mounted Retrofits:

Partially related to our comments above, it seems unnecessary that there are separate sections in the “Luminous Efficacy and Output” section for surface-mount retrofits used with non-directional luminaires. These retrofits should be treated as LED Light Engines (and included in same section), and meet the same performance requirements and have the same exceptions. It is our opinion that it is not necessary to specifically call out these lamps and have specialized zonal lumen requirements. Moreover, the retrofit kits described have many other potential uses other than wall sconces and ceiling lights (such as steplights) and the terminology used such as “surface mount” and “wall sconce” or “ceiling light” is much too restrictive. The fixture manufacturer should be allowed to decide best applicable products for these sources just as they can with LED Light Engines.



9.1 Solid State Light Engine Efficacy Requirements:

Since the entire premise of the “source efficacy” requirements is indeed the source, we do not support separate requirements for source with and without optics. The source itself should be the only product that is evaluated, and not the source+optics (same issue in the wall sconce and diffuse ceiling lights sections). Additionally, 90LPW is attainable but too high of a target at this time for many of the popular driver-on-board LED Light Engine designs. Particularly since California now requires such engines to be high CRI, and as such the efficacy level is lowered. We recommend a value closer to 75LPW.

In fact, as High CRI has recently (largely due to CA and CEE) become a very important criteria and requirement in product selection for all light sources, we recommend that when reviewing industry trends in selecting efficacy targets, EPA take additional consideration to how many of these products will be shifting to High CRI and the efficacy degradation involved.

CCT Requirements:

In the past year, “Retro-style” incandescent lamps that resemble the earliest incandescent lamp designs with visible filaments have become wildly popular. These styles are now being recreated with LED designs, and our customers have expressed that these designs are desirable in very warm CCTs that go below the traditional 2700K. 2000K-2200K range is the desirable CCT for such retro-style lamps. We support inclusion of lower CCT options for these and other LED lamp designs that intend to replicate these customer requests.

THD:

While not referenced in this document, questions regarding low THD requirements were brought up during some of the discussion meetings regarding this draft. MaxLite strongly supports no requirements be included for THD at this time due to the lack of industry information and understanding regarding this issue, and its potential unnecessary complication in light source design.

Startup Time:

MaxLite does not support increasing startup time to 0.5s. There may a significant impact on the GU24 CFL products as all of these lamps may not be able to meet these requirements. Moreover, such a change is inconsistent with the current Lamps specification, yields no additional energy savings, and we have not received any feedback that indicates consumer dissatisfaction with current startup times.



If there are any questions, please let me know.

Thanks.

Regards,

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