



Taylor Jantz-Sell
ENERGY STAR Lighting Program Manger
1200 Pennsylvania Avenue
NW MC 6202J
Washington, DC 20460

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Ms. Jantz-Sell,

Northeast Energy Efficiency Partnerships (NEEP) appreciates the opportunity to provide comments to the ENERGY STAR program to the third draft of the Lamp 2.0 Specification. After careful review of the specification and participation in the EPA led webinar on August 21st, NEEP, along with, DC Sustainable Energy Utility, the Cape Light Compact, Eversource Massachusetts, Liberty Utilities, and Efficiency Vermont (henceforth referred to collectively as NEEP), respectfully submit the following comments to supplement our Draft 1 comments submitted on March 13th and our Draft 2 comments submitted on May 8th.

Consideration for Further Revisions

NEEP is supportive of the list of future revisions EPA provided, particularly regarding reducing standby power. One additional consideration would be the potential shift to use LM-30 color rendering test (discussed further below).

Product Scope

NEEP fully supports EPA's expansion of the decorative product categories to include "filament" style LEDs, as they are growing in popularity and that has been observed throughout the Northeast and Mid-Atlantic.

CCT

NEEP is excited that EPA has expanded the specification scope to include lower CCTs of 2200K and 2500K, though recommends that these low CCTs should only be available to eligible decorative products or as part of color tunable or color dimming products. It is our fear that if all products are able to qualify to ENERGY STAR at these lower CCTs, consumers may be dissatisfied after purchasing light that is "too red" for their liking. Similar complaints abounded with "too blue" light in early LEDs, and while the technologies is much better refined at this point, it is our fear that consumers still may not understand how to select the right light and may opt for the product with the ENERGY STAR label for their general purpose lighting needs, but may not know how to select the proper color temperature and may end up dissatisfied.

Aligning with forthcoming DOE Test Procedures

NEEP supports EPA's intention to align with DOE's pending Test Procedures. While neither the LED nor CFL Lamp test procedure will be finalized before this specification is complete, they both are anticipated to be finalized relatively soon. As such, we recommend that in the year between this specification



finalization and implementation, EPA monitor the test procedure process and as appropriate make modifications to the specification to ensure alignment with the test procedures.

Color Rendering

With the recent release of LM-30 Color Rendering test, NEEP recommends at this point that EPA continue to test to the CRI criteria, but start asking manufacturers to report their LM-30 test data in order to evaluate whether in the next iteration of this specification, LM-30 may replace CRI as the color rendering test.

Color Tuning

NEEP supports EPA's proposed inclusion of color tuning lamps in this specification. A useful resource from DOE in the form of a presentation at LightFair 2015 is available here: http://energy.gov/sites/prod/files/2015/05/f22/miller+salzberg_color-tunable_lightfair2015.pdf and NEEP recommends following this guidance to ensure color tuning lamps are appropriately specified. Specifically, DOE identifies three types of color tuning lamps: RGB, dim-to-warm, and CCT. NEEP recommends EPA follow this terminology to help clarify the potentially confusing color tuning space.

Lamp Packaging

NEEP appreciates EPA's clarification on application exceptions to help mitigate potential problems with products being installed in inappropriate locations.

Thank you again for leading a productive and inclusive process and for offering the opportunity for NEEP and DC Sustainable Energy Utility, the Cape Light Compact, Eversource Massachusetts, Liberty Utilities, and Efficiency Vermont to provide comments on this third draft of the Lamps 2.0 Specification. Please don't hesitate to contact me with any follow up questions or clarifications.

Sincerely,

A handwritten signature in black ink, appearing to read 'Claire Miziolek', with a stylized flourish at the end.

Claire Miziolek
Market Strategies Program Manager
Northeast Energy Efficiency Partnerships (NEEP)
cmiziolek@neep.org
781-860-9177 x115