



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

November 23, 2015

Ms. Jantz-Sell,

Northeast Energy Efficiency Partnerships (NEEP) appreciates the opportunity to provide comments to the ENERGY STAR program on the interim proposal for the Lamp 2.0 Specification. After careful review of the specification and participation in the EPA-led discussions on November 12<sup>th</sup>, 13<sup>th</sup>, 20<sup>th</sup>, and 23<sup>rd</sup>, NEEP respectfully submits the following comments.

#### **Rated Life**

NEEP strongly supports EPA's proposal to lower the omnidirectional rated life to 15,000 hours. NEEP feels this is a critical step to ensure continued viability of the ENERGY STAR lighting program and for the greater good of consumers. We do not feel that a 15,000 rated life equates to a lower quality product and in fact, if the suite of proposed changes are adopted, this specification would push quality levels higher than ever before. We do not fear that lowering the lifetime for omnidirectional products will have negative consequences and rather we feel that it will allow great, third-party tested products to reach more homes at lower price points than ever before.

NEEP feels that at this point, directional products should stay at 25,000 hour rated life. That being said, we would be open to revisiting this rated life requirement in subsequent updates to the specification to see if it is still appropriate.

Finally, NEEP strongly supports the tightening of requirements for passing life and lumen maintenance testing to ensure products with early failures do not gain certification.

#### **Omnidirectionality**

After deeper analysis of the proposed changes, NEEP would request that EPA only make the three proposed changes to the omnidirectional requirement with sufficient research to confirm that all three changes would not impact the customer experience. Of the three proposed changes, NEEP does feel comfortable changing the down lit zone from 135 to 130 degrees. Of the other two proposed changes, however, NEEP is fearful that both a 35% threshold in luminous variance AND a decrease of the pass rate for luminous intensity to 80% may mean many products with unexpected light distributions would be passable. NEEP would recommend that, unless there is sufficient evidence that both adjustments will not have an impact on the average consumer, that only one of the two proposed changes go into effect (either 90% pass but have a range of 35% difference, OR 80% pass but have a range of 25% difference). We hope by making this slight adjustment EPA can better ensure unexpected light distributions are not experienced by consumers new to LED products.



### **Power Factor**

After much consideration, NEEP feels that there is not a compelling benefit to lowering power factor down to 0.5 for LEDs, and therefore we recommend that EPA keep power factor at current levels of 0.7. While we understand that it is a cost consideration to reach 0.7, we also recognize that many products are reaching power factor levels close to 0.7 in absence of the ENERGY STAR program. In CLEAResult's presentation at NEEP's October 1<sup>st</sup> Northeast Residential Lighting Workshop, they presented an average of 0.66 power factor for a half-dozen of the lower-lifetime, non-ENERGY STAR "Ish" bulbs in the market.<sup>1</sup> As such, we feel that the pricing information provided to EPA on moving products from 0.5 to 0.7 might have been correct, however if products already on the market are at 0.66, the cost of moving from 0.66 to 0.7 would be minimal and would separate a higher quality product for customers and efficiency program promotion.

### **Efficacy**

NEEP is supportive of EPA's proposed efficacy levels. While high-CRI is not an attribute given high precedence in the Northeast or Mid-Atlantic, the way this specification is designed would allow for sufficient flexibility for program administrators to promote the product that works best for them. NEEP would urge EPA to consider raising the minimum for high-CRI directional products based on where product availability is expected to be in 2017, and not strictly where the market is now. Particularly for directional products, we know that LEDs are incredibly efficient and we would ask that the directional/high-CRI product category not lag behind in this specification.

Furthermore, NEEP would request that EPA poll program partners to confirm that having an archived list of legacy products on the ENERGY STAR website would be sufficient for programs that may want to continue to support ENERGY STAR CFL's after they are off the QPL in 2017. We feel that this issue can be resolved throughout 2016 and does not need to hold up the process for the Version 2 specification. If programs express a consistent need to keep CFLs on the QPL for another 6 months beyond the effective date of 1/2017, we would ask EPA to consider this in a 2.1 specification revision.

### **Warranty**

In addition to the above comments, we wanted to recommend that EPA increase the warranty requirements for omnidirectional lamps. The 3 year requirement for LEDs expected to last 15,000 hours (13 years!) is counterintuitive. We feel that increasing the warranty to 5 years would increase consumer satisfaction and would be a complementary assurance for manufacturer commitment to long-lifetime. Furthermore, as the prices decrease on products, the likelihood of customers submitting warranty requests for a \$2 or \$3 product is low.

---

<sup>1</sup> Slide 105 from deck accessible from: <http://neep.org/events/2015-residential-lighting-workshop>



Furthermore, we would also request that warranty information does not need to all be spelled out on the box—if there is a URL, a phone number, and then the number of years that a warranty will last, that is sufficient. This addition of a phone number is critical to ensure all customers can access their warranty.

### **Labeling and Disclosure**

Lastly, with more products entering the QPL with lower lifetime components, it is expected that many of these will not be dimmable nor rated for use in enclosed fixtures. We therefore recommend that ENERGY STAR include a recommendation for manufacturers to increase font-size requirements for “non-dimmable” and “not for use in enclosed fixtures” to ensure that customers are purchasing products that meet their expectations.

Thank you again for leading a productive and inclusive process and for offering the opportunity for NEEP to provide comments on the interim proposal for 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 horizontal line extending from the end of the signature.

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