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Ms. Jantz-Sell,

Northeast Energy Efficiency Partnerships (NEEP) is very much appreciates the opportunity to provide input to the ENERGY STAR program on the Lamp 2.0 Specification development. NEEP, along with the DC Sustainable Energy Utility and United Illuminating (henceforth referred to collectively as NEEP), respectfully submit the following comments in support of the Draft Final specification.

I have been very impressed with the process EPA has put forward to hear from many stakeholders on a variety of concerns. 2015 has been a very interesting year in the lamp market and EPA has juggled the changes very well to arrive at a strong specification. In general, NEEP supports the Draft Final proposal. A few specific points for consideration are included below.

**Labeling:** While NEEP fully appreciates the challenge manufacturers face with limited space on packaging, we do think that with more LEDs entering the marketplace with lower lifetimes and different components, it is likely that there will be more products on the QPL that are not dimmable or rated for use in enclosed fixtures. While we don't see this as a market challenge, we do feel that encouraging manufacturers to very clearly label these limitations, and retailers to assist in this effort, would help encourage widespread consumer satisfaction. We recommend EPA include a recommendation (not requirement) 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.

**Warranty:** Given the state of the QPL with the proposed changes taken into account, it seems that a higher warranty could be a consideration for a future revision.

**Connection to Hubs:** NEEP would recommend that EPA revisit the language use to describe the standby power from hubs connected to smart lighting products, as the lightbulb uses standby power when it isn't on, but the hub is just using normal power draw at that point. As such, we want to be sure the information is reported correctly.

**Omnidirectionality:** Consistently, this has been a major concern for program administrators and efficiency advocates; if a product doesn't shine light where a customer expects it to, they will not be satisfied. The changes EPA has made to the specification seem reasonable, and the study EPA put together was substantive, but NEEP would generally encourage further research and discussions on the opportunities for omnidirectionality revisions. Should additional research come to light that the proposed omnidirectionality requirements do not meet customer expectations, NEEP would encourage EPA consider revising those requirements in a specification update.



**General changes:** NEEP supports the EPA's changes in rated life, power factor, and efficacy. At this point, we are comfortable with the effective removal of CFLs from the specification by the effective date in 2017 as long as EPA posts an archived QPL as is standard practice.

NEEP, DC-SEU, and United Illuminating again thank the EPA for leading a productive and inclusive process and for offering the opportunity for NEEP to provide comments on the draft final as well as along the way for Lamps 2.0 Specification. Great job with the process and the outcome. Please don't hesitate to contact me with any follow up questions or clarifications.

All the best,

A handwritten signature in black ink, appearing to read 'Claire Miziolek', with a long horizontal flourish extending to the right.

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