

## Rogers, Daniel

---

**From:** Jim Bellamy <JimB@penlight.org>  
**Sent:** Tuesday, November 24, 2015 4:41 PM  
**To:** 'lighting@energystar.gov'; 'Jantz-Sell.Taylor@epamail.epa.gov'  
**Subject:** Stakeholder comments Draft Version 2.0 Energy Star Lamps

EPA Energy Star Lamp Standards:

Peninsula Light Company is a “full requirements utility” of the Bonneville Power Administration. The utility has grown to be the second largest cooperative in the Northwest, serving over 31,600 meters with 977 miles of line and 112 square miles of service territory. We are deeply concerned with the move to relax the power factor standards for LED lighting.

Lighting comprises approximately 17.5% of global electricity consumption. As the world transitions from incandescent to solid state lighting (SSL) technology, utilities and government regulatory agencies worldwide are concerned that, as this large segment of the consumption base switches to SSL, it will increase infrastructure costs. This is due to the reactive nature of LED-based solid state lighting, which results in higher distribution currents that adversely affect power factor (PF) and, in turn create a larger demand on the power grid.

The move to LED-based solid state lighting promises a significant reduction in the carbon footprint of the electrical power grid simply due to the dramatic reduction in real power consumption. However, if power factor is not managed, the grid will still need to be able to provide a much higher power level than is actually needed at the load, eliminating a significant portion of the benefits of moving to solid state lighting.

Reducing the power factor requirement for Energy Star rating to as low as 0.50 sets a very low bar for what will be the standard product in the marketplace. Lowering the standard to the level of the CFL products is a repeat of a mistake made at the time CFL standards were compromised, much to the detriment of the efficiency of the national power grid. Utilities have been negatively impacted by the reduction in performance of the CFL. To say that the low power factor has no impact on the consumer is erroneous. Electric utilities must pass along to all their customers the cost of service. That cost of service includes the impact on the electrical system for poor power factor.

In conclusion, we believe further input of the utility industry must be sought out and included in the development of such an important standard before the standard is set to allow such poor performance as it is currently proposed.

---

### *Jim Bellamy*

Energy Services Coordinator

Office: (253) 853-1386

Cell: (253) 377-4774

[www.penlight.org](http://www.penlight.org)



This electronic message may contain proprietary and confidential information of Peninsula Light Company and/or its affiliates. The information is intended to be for the use of the individual(s) or entity(ies) named above. If you are not the intended recipient (or authorized to receive this e-mail for the intended recipient), you may not use, copy, disclose or distribute to anyone this message or any information contained in this message. If you have received this electronic message in error, please notify us by replying to this e-mail.