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**From:** Peek, David  
**Sent:** Tuesday, March 24, 2015 12:29 PM  
**To:** lighting@energystar.gov  
**Subject:** ENERGY STAR Luminaires V2.0 (draft) comments



March 24, 2015

RE: Energy Star Luminaire V2.0 (draft) comments

To Whom It May Concern:

Thank you for the opportunity to provide the following comments for the proposed V2.0 draft.

#### Effective Date

- Date is still listed as TBD which does not give US businesses reasonable notice to plan for the many complicated changes compliance will entail.
- Has EPA is given consideration to whether CB's have the capacity to accommodate a timely transition? (Especially in light of the revelation that the CSD will no longer include self-ballasted lamps.)
- This uncertainty also does not provide an opportunity for EPA partners to manage inventories, which typically have cycle times of 180+ days. Energy Star partners have faithfully supported the goals of the program and due consideration should be granted to help partners avoid significant obsolescence which will be a drain on the economy.
- Finally, EPA has not demonstrated that manufacturers are able to comply with these new standards according to the published "planned timeline". Technological and manufacturing retooling along with safety and energy certification have lead times of approximately 18 months which should be considered when setting implementation dates.

#### Definitions

- The definition for "ceiling / close-to-ceiling mount luminaires" appears to incorrectly describe these fixtures as providing "less than 90% of light downward"
- There is no definition for "separable"

#### 8.1 Non-Directional Luminaires Shipped with Energy Star Certified Lamps

- Since EPA intends to discontinue publishing approved lamps on the CSD, implementation should be delayed pending implementation of revisions to the lamp standard currently underway. Otherwise, luminaire manufacturers do not have any ability to list new products until the new qualified lamp listing is available.
- Since Luminaire manufacturers do not typically also produce lamps (light bulbs), this requirement creates complexities that EPA needs to consider:
  - Due to the rapid rate of change in the lamp market, luminaire manufacturers will be forced to constantly revise specifications and listings to stay in compliance. This situation creates unnecessary complexity and cost with no real benefit to consumers. EPA should STRONGLY reconsider the plan to allow the use of Energy Star lamps as a path to certification.

- Alternately, non-directional fixtures should be completely dropped as a category or **ONLY** non-directional luminaires with sockets or light engines that are **dedicated** to efficient sources should be included in the program.
- EPA needs to reconsider all plans that require luminaire manufacturers to include replaceable lamps. This requirement increases cost to the end user, limits selection, discourages innovation and introduces potential negative environmental hazards from breakage of fragile components shipped with much heavier luminaires.
  - Cost example: if a luminaire manufacture pays \$2/per lamp, that cost is passed through to the end user typically with a 4x markup (\$4 cost -> \$8 wholesale -> \$16 retail). For a 5-light chandelier, that adds \$80 to the retail price which the end-user likely could have obtained for 50-75% less if bulbs were not included.
- “Lamps included” is not viewed as a positive requirement by retailers since it contributes to shrink (as a result of theft and damage), obsolescence, inflated retail prices and lost sales in the lamp segment. EPA should strongly consider reaching out to Lowe’s, Home Depot, and other major retailers that offer Energy Star lighting products.

### 9.1 Luminous Efficacy and Output: NON-DIRECTIONAL Luminaires

- In draft 2, EPA has returned all efficacy requirements to levels that are already required under V1.2 ... why do existing E-star fixtures need to be requalified/recertified since there are effectively no changes for non-directional fixtures?

### 9.2 Luminous Efficacy ... DIRECTIONAL Luminaires

- Please consider returning all outdoor “post” lighting to non-directional classification. Residential post lights are not a significant contributor to a phenomenon referred to as “light pollution”. Areas of the US that are considered the worst offenders are major cities where single-family housing is largely not present. These environments make use of larger commercial post lights that are not covered by Energy Star. A possible pathway would be to qualify fixtures as non-direction if they are not designed/marketed for installation on posts that are >8’.

### 12.1 Light Source Replaceability

- Solid State: “For the purpose of this specification, wire nuts are not considered an acceptable connection method.” EPA needs to provide clarification – acceptable connection method to what? Internal to the luminaire? Connection to power supply from building?
  - Wire nuts are acceptable both in UL 1598 and NEC ... why does EPA deem these an unacceptable connection method?

### 16.1 Labeling & Packaging: All Luminaires

- Amend the verbiage in the following statement to align with commentary from the webinar that indicated this requirement is meant to be optional
  - “Packaging shall clearly describe the nominal color designation of the lamp in units of Kelvin (e.g. 2700K, 3000K) and the corresponding nomenclature as outlined below.”

### 16.2 Light Source Shipment

- There is no option under Solid State to ship with “lamps that utilize an ANSI/IEC standardized lamp base” ... it was mentioned in the webinar that section 8.1 overrides section 16.2, but that is not clear in the current draft.

### 18 Lighting Toxics Reduction Requirements

- Why is a US Federal agency relying on a European standard? If this is so important to EPA, why is the reference to a 12 year old standard that is not even still in effect in Europe? If there is no equivalent US standard, then this requirement should be eliminated, especially in light of the method of compliance that does not require any actual demonstration of compliance.

Regards,

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