March 25, 2015

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Subject: Comments and Proposed Revisions to ENERGY STAR Program Requirements,  
Product Specification for Luminaires – Version 2.0, Draft 2

Terralux very much appreciated the opportunity to participate in the stakeholder review meeting, and provide final comments for this draft version.  

In keeping with the discussions during the meeting, Terralux would like to comment and propose the following revisions to the Draft 2 specification at this time. We have detailed each affected section below:

9.1 – Luminous Efficacy and Output: NON-DIRECTIONAL Luminaires

Comment: Terralux supports the Draft 2 efficacy levels for NON-DIRECTIONAL luminaires, with particular attention to Solid State: Surface-mounted retrofit for diffused wall sconces, and Solid State: Surface mounted retrofits for diffused ceiling mounted lights.

9.2 Luminous Efficacy, Output and Zonal Lumen Density: DIRECTIONAL Luminaires

Comments – Terralux supports the Draft 2 efficacy levels for DIRECTIONAL luminaires, with particular attention to Downlights, and SSL downlight retrofits.

– SSL Downlight Retrofit aperture size - Terralux feels that the minimum light output requirement for SSL: Downlight retrofits should follow the downlight category, with respect to aperture size. This proposed change would support single 13 watt and 18 watt CFL replacements. We believe that 400 lumens is appropriate for a single 13-watt replacement.

Proposal -

≤4.5” aperture: 400 lumens
>4.5” aperture: 575 lumens

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