

ENERGY STAR® Summary of Stakeholder Comments on Connected Lighting for Lamps and Luminaires - March 2015

Topic	Comment
Inclusion of Connected Lighting	Some stakeholders were very encouraged by EPA's interest in developing connected product criteria. An efficiency organization stakeholder was interested in the potential opportunities connected products represented for utility direct load and behavioral change programs. Other stakeholders thought that it was too soon for EPA to be working in this space since industry standards do not exist for testing these functionalities and had concerns about the cost of developing third-party connectivity. One partner commented that connected lamps should be held to the same photometric, electrical and mechanical (ANSI shape) requirements as non-connected lamps.
Stand-by power	A number of stakeholders expressed concerns about the growth of stand-by power on the overall load. A few efficiency organization stakeholders suggested lowering the stand-by power requirement to 0.25W. One partner commented that the proposed requirement of 0.5W was fine, while another partner recommended increasing the requirement to 1W. It was noted that the DOE test procedure cited is for LED products, and a test procedure may need to be designated for connected CFL products.
Energy Consumption Reporting	One partner suggested removing this section, citing the limited value it would provide for residential lighting and that energy consumption reporting of this magnitude should be reserved for products with larger loads. Another partner expressed concern that the lack of an industry standard would make it difficult to ensure all connected lamps work with all energy management systems and recommended that EPA adopt requirements in the future as technology and standards are developed. Another stakeholder suggested adding language to include provisions for reporting power in watts or having manufacturer-provided method for estimating power consumption in watts.
Operational Status Reporting	One efficiency organization stakeholder requested that luminous intensity and the corresponding actual energy consumption be reported so power consumed when a product is dimmed can be tracked. Another stakeholder suggested simplifying the language so that the lamp, at minimum, allows the user to be informed of its status (on/off, light output, etc.). One partner noted that the operational status reporting section gives flexibility to the manufacturer and that information a lamp could report may be identical in Sections 12.9 (Energy Consumption Reporting) and 12.10 (Operational Status Reporting). Another partner suggested removing "energy management system" and simply requiring that the lamp reports information to the consumer.

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Open-standards and open-access	A few stakeholders supported the concept of open standards and open access. One efficiency organization stakeholder recommended that having open and non-proprietary means for achieving two-way connectedness should be considered the base for a "connected" product. This stakeholder also recommended that connected products be equipped to communicate via all major communication pathways so that consumers have the ability to participate in utility programs even if the lack broadband or wireless access, but also urged EPA to carefully consider its requirements to safeguard customer data. A partner suggested that if no suitable open standardized method existed then partners be required to use an open and documented communication method that is published with the lamp.
Remote Management	One partner suggested removing this section, citing the limited value for residential lighting and that it could hinder adoption of efficient lighting because ensuring these capabilities would add time and cost. Another partner suggested adding language which clarifies how the lamp may both receive and respond to commands.
Testing	One stakeholder asked if test laboratories or certification bodies will have to test for these features or if manufacturers will be required to provide documentation stating that they meet the criteria? One efficiency stakeholder recommended that EPA and DOE work together to develop a test procedure that can evaluate a connected load's ability to respond to price signals since some utilities are moving towards offering time-based pricing in the residential market. It was noted that the current DOE draft test procedure for demand response functionality only addresses reliability-based signals.