



January 6, 2023

Taylor Jantz-Sell
ENERGY STAR Lighting Program Manager
U.S. Environmental Protection Agency
Washington, D.C. 20460

Dear Ms. Jantz-Sell,

Thank you for the opportunity to share comments regarding the EPA's proposal to sunset the ENERGY STAR (ES) specifications for lamps, luminaires, and ceiling fan light kits. The DesignLights Consortium (DLC) works with lighting industry stakeholders to develop quality and performance technical requirements for commercial lighting products. Our members are energy efficiency programs who rely on DLC technical requirements to help administer their commercial programs. These members also rely on the ES certification for their residential lighting programs, and some products in their commercial lighting programs. We have discussed the ES Lighting Sunset Proposal with our members and we have some collective comments and questions for your consideration.

Aligned with the ES proposed timeline and reasoning, many of our members are removing their incentive offerings for residential lighting fixtures and/or lamps over the next couple of years. Going forward, ample communication about plans and timelines for the ES changes was identified as a major need for our members. The communication for plans, specifically timelines and availability of ES product data is very important to us. We are looking forward to clarification on next steps and timelines.

Some of our members have expressed interest in continuing to use the product data on ES products after the program has closed. We would like to know how long this data will be accessible, and in what format.

We understand that the U.S. Department of Energy (DOE) backstop of 45 lm/W was part of the rationale for the sunset of the ES lighting program, but it only applies to lamps and not luminaires. Our members identified downlights and linear fixtures as two of the most important product types currently covered by ES within their commercial programs. Downlights represent 47% of the products currently qualified by ES and we are concerned about future integrity and quality of residential luminaires after the ES lighting program has closed. We are also concerned that a backslide in luminaire efficacy may occur. The DOE's backstop of 45 lm/W is lower than ENERGY STAR's current efficacy requirements for lamps. Without federal requirements, ES works to uphold and push further efficacy and improvements in quality. It may be premature to close the ES lighting program before federal requirements are in place.

Lighting is an important technology in people's lives, not only efficacy, but the integrity of product and quality of light has been strengthened by the ES program. ES currently specifies quality metrics such as CRI, power factor, lumen maintenance, and warranty. While CRI, and power factor are proposed as part DOE's new proposed standards, warranty and lumen maintenance are not covered for LEDs. Lifetime requirements for CFLs are defined in the DOE's proposal, but there is no consideration for the lumen depreciation or color shift of LEDs. Without ES, we see this as a gap for the quality of LEDs in the marketplace. Our members have expressed that not only is there still room for improvement in these areas, but a concern that without regulation the market will foster a race to the bottom with lower quality lights becoming ubiquitous. We strongly encourage DOE/EPA/ES to consider lumen maintenance in its standard.

We look forward to hearing your thoughts on the topics above, and any other considerations that you would be open to sharing with us.

Sincerely,
DesignLights Consortium