

**From:** [jds1consulting@gmail.com](mailto:jds1consulting@gmail.com)  
**To:** [lighting@energystar.gov](mailto:lighting@energystar.gov)  
**Cc:** [jds1consulting@gmail.com](mailto:jds1consulting@gmail.com)  
**Subject:** EPA Sunsetting lamps, luminaires, and ceiling fan kits  
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I am writing to support the EPA's proposal to sunset ENERGY STAR specifications for lamps, luminaires, and ceiling fan light kits.

Over a period of 18 years I had the privilege to work on ENERGY STAR specifications for these products as well as ENERGY STAR bathroom ceiling exhaust fans/lights and Exit signs.

It is important to remember that the ENERGY STAR specifications were designed to save energy while also protecting the quality of performance.

I was skeptical when the ENERGY STAR Exit sign specifications were sunset because I feared that with the DOE standards, utilities would abandon incentives (rebates) to upgrade from less energy efficient products to new products meeting DOE standards.

DOE standards cover import and manufacturing, but don't require that existing equipment be updated.

I was wrong. New construction obviously required meeting DOE standards, but many utilities continued to offer incentives for upgrading in existing buildings.

Similarly, moving from the ENERGY STAR voluntary program to DOE standards will force, over time, sellers to only carry products meeting DOE standards.

The lamp market has already pretty much made this transition.

The same is true for luminaires and ceiling fan light kits. However, there will be a lack of motivation, other than the actual energy savings, to motivate home owners and landlords to replace existing luminaires and ceiling fan kits with the more energy-efficient equipment.

This still leaves an opportunity for utilities to incentivize upgrades through some creative programs. I remember when some utilities offered incentives to "bring in your old incandescent lamp for a CFL." Whether this will be done or not is unknown. Regardless, I think the EPA is making the right move in sunsetting ENERGY STAR on these products. In the long term, the DOE specifications will save a lot of energy by moving them to a standard as opposed to a voluntary program.

I applaud EPA for their work on these products over the years, and the energy savings achieved under the ENERGY STAR program.

*Jeff Schwartz, LC, Member Emeritus IES*

Owner

JDS1 Consulting

[JDS1Consulting@gmail.com](mailto:JDS1Consulting@gmail.com)

518-424-5736