



Together We Can Change
National Markets

May 30, 2003

Rich Karney
ENERGY STAR Program Manager
U.S. Department of Energy
1000 Independence Avenue SW
Washington, DC 20585

Dear Mr. Karney,

On behalf of the CEE Lighting Committee (the Committee), I would like to thank you for the opportunity to submit comments on the second round of revisions for the ENERGY STAR CFL specification. The Committee's comments fall into two general categories of high priority comments, and general recommendations. A list of the CEE member organizations supporting these comments is listed in the attachment.

Top Priority Recommendations

1. Testing for Initial Qualification

Recommendation: The Committee strongly supports DOE's Draft 2 proposal to require testing to 40% of rated life prior to initial qualification, and recommends that DOE maintain the Draft 2 allowance of one failure for this test.

The Committee supports requiring 40% of life testing in advance of ENERGY STAR qualification. The Committee also believes that allowing two failures in this test, as has been suggested by some manufacturers, would be unacceptable. Further, the group has concerns with allowing even one failure (a 10% failure rate), and recommends that one failure in this important test be used as a trigger for a second testing cycle of ten additional products.

Regarding the inclusion of rapid cycle stress testing, the Committee strongly supports DOE's Draft 2 language that requires completion of rapid cycle stress testing prior to qualification.

2. Additional Testing Requirements for Reflectors CFLs

Recommendation: Due to the Committee's serious concerns regarding in-field performance of reflector CFLs (lumen depreciation and total failure), we urge DOE to adopt additional testing requirements for reflector CFLs within this specification revision. Specifically, the Committee recommends that DOE adopt the modified IESNA LM-65-91 testing conditions developed by the Pacific Northwest National Laboratory (requiring testing at 50-60°C). These testing conditions are attached for your review.



As DOE is aware, recessed cans with screw based sockets are among the most popular fixtures in new construction, and due to heat build up in insulated ceiling environments, reflector CFLs are among the CFL types with the highest consumer return rates. Recent third party testing has demonstrated the seriousness of this problem. While some stakeholders have asked for the removal of this product category from the ENERGY STAR Program, the Committee believes that DOE has both a responsibility and an opportunity to address this problem through a change in testing requirements. Specifically, the Committee recommends that DOE require the higher temperature testing conditions for CFL reflector lifetime testing, lumen maintenance testing, and rapid cycle stress testing that were developed by PNNL.

3. Third-Party Testing

Recommendation: The Committee recommends that DOE consider requiring participation in and/or sponsorship of a third-party testing organizations as part of the ENERGY STAR CFL specification.

Due to growing concerns about the quality of ENERGY STAR-qualified CFL products on the market, the Committee recommends that DOE consider instituting a requirement in the specification for manufacturers to participate in and/or provide financial support for third-party testing organizations. The Committee believes that after-market, third-party testing would help to maintain the integrity of the ENERGY STAR program.

General Recommendations

1. Increasing Efficacy Requirements

Recommendation: The Committee would like to thank DOE for the opportunity to present a proposal on increasing efficacy levels at the recent stakeholder meeting, and would like to reiterate the request that DOE consider raising current efficacy requirements within this specification revision.

The Committee supports the draft testing protocol that requires efficacy to be reported as the average of the lesser lumens per watt measured in the base up and base down positions. In addition, during the 2001 specification revision, the Committee urged DOE to revise efficacy levels for specific product classes of CFLs, which are listed below. This recommendation was based upon a report completed by Ecos Consulting and sponsored by the Natural Resources Defense Council, which is attached. In addition, the development of an industry-supported Energy Conservation Program being implemented in China with higher efficacy levels than ENERGY STAR also signals that the time has come for DOE to reconsider efficacy. The chart below contains a possible starting point for industry consideration and discussion.

Product Type	Current Levels	CEE Previously Proposed Levels	Chinese Levels
<i>Bare Lamp</i>			
Lamp Power <15	45	50	50, 58
Lamp Power ≥15	60	N/A	65, 70
<i>Covered Lamp (no reflector)</i>			
Lamp Power <15	40	48	N/A
15 ≤ lamp power <19	48	53	N/A
19 ≤ lamp power <25	50	53	N/A
Lamp power ≥25	55	N/A	N/A
<i>Covered lamp (w/reflector)</i>			
Lamp power <20	33	N/A	N/A
Lamp power ≥20	40	N/A	N/A

2. Correlated Color Temperature (CCT)

Recommendation: The Committee recognizes the complexities of measuring and reporting CCT in a manner easily understood by consumers and supports DOE’s efforts to work with stakeholders to improve the current testing and reporting procedures. While DOE and stakeholders are working on an improved protocol, the Committee supports measurement and reporting of CCT as required in the current specification.

It is the Committee’s belief that the intent of the current CCT requirement is intended to match the warmth of the most common residential lighting types, namely incandescent and halogen. In previous comments, the Committee urged DOE to narrow the range of acceptable color temperatures in an effort to better meet consumer expectations. After receiving feedback on this approach at the stakeholder meeting, the Committee has modified its original position.

We recommend that DOE concentrate its efforts on engaging stakeholders in a dialogue on the best ways to measure color, rather than on requiring discrete CCT values in the short term. Specifically, the Committee would like to work with DOE and other stakeholders to develop consistent labels (e.g. cool white/warm white/daylight) with defined corresponding ranges of CCT values that would provide consumers with necessary information without being confusing.

3. De-listing Protocol

Recommendation: The Committee recommends that DOE add a greater level of detail to the de-listing protocol described in the draft specification to specifically describe the responsibilities of all parties.

While Draft 1 of the specification included more detailed language on the steps DOE will take when de-listings occur, much of this language was removed in Draft 2. The Committee recommends that DOE begin a process to fully consider the intricacies of de-listing products and



articulate a timeline for finalizing the protocol. The Committee recommends that these discussions include manufacturers, retailers, and efficiency groups and be focused on developing a de-listing process that provides clear, detailed instructions for all interested parties.

4. Candelabra-base Lamps

Recommendation: Due to increased interest in promoting specialty CFLs, advances in manufacturing that enable production of smaller products, and in light of the positive reception to this topic at the recent ENERGY STAR stakeholder meeting, the Committee recommends that DOE widen the scope of the specification to include candelabra base products.

The Committee recognizes that candelabra-base CFLs may require slightly different efficacy levels than currently covered products, and urges the initiation of necessary research to set these levels. If DOE chooses not to include this class of product in this iteration of the specification, the Committee urges DOE to develop a schedule for consideration of candelabra-base CFLs in advance of the next revisions to the specification, and to announce to industry the intent to have this product class covered in the future.

5. Bi-annual Reporting of Shipment Data

Recommendation: The Committee supports DOE's efforts to obtain CFL shipment data from manufacturers and encourages DOE to conduct detailed discussions with industry to allay their concerns regarding confidentiality.

The Committee recognizes that developing a data reporting procedure is a challenging task, and thanks DOE for its willingness to pursue this portion of the Partner Agreement. As program approaches move from consumer rebates to special promotions and industry partnerships, sales and shipment data have become an even more important part of efficiency program evaluation. Aggregate national and regional or state level data collected by DOE and disseminated bi-annually to efficiency program administrators would serve this key informational need, and would help ensure the continuation of efficiency programs.

Once again, the Committee would like to thank the Department of Energy for the opportunity to comment on the draft revisions to the ENERGY STAR CFL specification. Please contact CEE Residential Program Manager Rebecca Foster at (617) 589-3949 ext. 207 with any questions about these comments.

Sincerely,

A handwritten signature in black ink that reads 'Marc J. Hoffman'. The signature is written in a cursive, flowing style.

Marc Hoffman
Executive Director



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National Markets

cc: Ronald Lewis, DOE
Susan Gardner, D&R International

**ATTACHMENT:
LIST OF SUPPORTING ORGANIZATIONS**

American Council for an Energy Efficient Economy
Cape Light Compact
Efficiency Vermont
Midwest Energy Efficiency Alliance
National Grid
Northeast Energy Efficiency Partnerships
Northwest Energy Efficiency Alliance
NSTAR Electric
NYSERDA
Pacific Gas & Electric
Sacramento Municipal Utility District
The United Illuminating Company
Unitil: The Fitchburg Gas & Electric Company
Western Massachusetts Electric Company
Wisconsin Division of Energy