CEE Together We Can Change National Markets

August 15, 2003

David Shiller
ENERGY STAR Marketing Manager
Environmental Protection Agency
Ariel Rios Building, SW, MS 6202J
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Dear David:

The CEE Residential Lighting Committee (Committee) appreciates the opportunity to provide input into the proposed changes to the ENERGY STAR fixtures specification. This Committee has been very supportive of this program since its inception and looks forward to working together to ensure its continued success.

The following comments and recommendations are made on behalf of the CEE Residential Lighting Committee and are supported by the organizations listed on page 4.

TOP PRIORITY RECOMMENDATIONS

1. Durability Testing – Lamp Standardization and Associated Reporting
The CEE Lighting Committee supports EPA's efforts to enhance the durability of qualified products through lamp standardization and associated reporting requirements. The Committee shares EPA's concerns about the durability of products carrying the ENERGY STAR label, and agrees that qualified products should meet a durability threshold.

2. Durability Testing – Base Standardization
As part of the language on durability testing, EPA has included mention of base standardization in the specification for the first time. The Committee supports EPA's efforts to allow only standardized bases into the program, as consumers may face difficulties in replacing proprietary bases.

3. Recessed Downlight Retrofit Kits – Specification Levels
The Committee supports the inclusion of recessed downlight retrofit kits in the ENERGY STAR program, and supports the specification developed proposed by EPA. Further, the Committee requests that DOE remove the language in the definition section of the specification that requires pigtail connections to be non-reversible. The Committee believes that reversibility is an important consumer consideration, because, unlike other fixture types, a non-reversible recessed can would require an electrician to replace.

4. Recessed Downlight Retrofit Kits – Expansion to all Recessed Downlights
The Committee believes that all recessed downlights, regardless of whether they are intended for retrofit or new construction, should be covered under the same specification. We urge EPA to

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include new construction products in the recessed downlight category and recognize all downlights as unique products with additional specification requirements.

GENERAL RECOMMENDATIONS

1. Maximum Ballast Operating Case Temperature
The Lighting Committee supports EPA's efforts to enforce this specification requirement by requesting test data from recessed and electronically-ballasted flush mount ceiling fixtures. With regard to the test protocol used to generate the maximum temperature, we suggest that EPA clarify which test method should be used. Both the LRC test method and UL 1598 are listed, but these methods are not identical. The LRC method is based on UL 1598 but measures performance, rather than safety, and requires thermocouples to be placed in different locations.

In addition, the current LRC test method for temperature contains the following language: "The LRC proposes to require manufacturers to perform the durability testing method for non-IC recessed fixtures and surface mounted fixtures." Conversations with LRC staffers confirm that IC cans were left out of this statement unintentionally. The LRC will be issuing an amendment to the test method that includes IC cans, and the Committee suggests that EPA make a clear statement about the scope of the test requirements in the specification.

2. Delisting
In the current revision of the ENERGY STAR CFL specification, the Committee has urged DOE to develop and implement a de-listing protocol for qualified products that are shown to be non-compliant. The Committee would like to extend this recommendation to EPA and request that EPA and DOE work in cooperation to develop a coordinated de-listing protocol. Such a protocol would lessen the time and resources that efficiency programs spend to verify de-listings, make associated program changes, and communicate changes to retailers and other program participants.

3. Lamp Life Testing
The Committee supports the current lamp life requirement of 10,000 hours, although has concerns that no data are required to substantiate these life claims. The group requests that EPA request test reports from a random group of qualified products to ensure that they are fully meeting this component of the specification. If a problem is discovered through this data request, the Committee recommends that EPA collect test data from all qualified products in the future.

4. Data Reporting
As is required under the partner commitment section, all ENERGY STAR partners agree to provide EPA unit shipment data on an annual basis. This information is extremely valuable in tracking program market impacts, and the Committee urges EPA to share the data with efficiency programs as appropriate.

In addition, rather than requiring reporting only once a year, EPA should increase the frequency of data submission to a bi-annual basis, which would be consistent with the proposed CFL

specification. To the extent that state-level data are available, these data would also be extremely beneficial in informing the on-going planning of statewide and regional efficiency programs, and should be pursued by EPA.

5. Photocells for Outdoor Fixtures
Data from an on-going lighting program in New England has shown that photocells are a contributor to higher than average failure rates for ENERGY STAR-qualified fixtures.[1] Specifically, fixtures with photocells were found to have a 12.2% return rate, significantly higher than the 5.7% return rate of fixtures without photocells. The Committee has concerns about products with photocells, and would like EPA to investigate the issue further.

6. Dimmability
The Committee supports EPA's proposal that all fixtures with dimming ballasts must be dimmable from 100-30% of maximum light output. However, the specification does not require test data to be submitted, and the Committee asks that EPA consider collection of test reports to verify such claims.

7. Schedule and Effective Date
To coordinate with the concurrent revision of the ENERGY STAR CFL specification, and to minimize potential negative impacts on this Fall's Change A Light Campaign, the Committee recommends that EPA postpone the effective date until October 1, 2003, with all revised manufacturer data being due no later than January 1, 2004.

8. Correlated Color Temperature (CCT)
The Committee recommends that EPA work in coordination with the Department of Energy to develop an improved measure of CCT. The Lighting Research Center has provided DOE with a proposal requiring reporting of chromaticity coordinates using a 4-point MacAdam ellipse as tested by ANSI C78-376-1996. The Committee recommends that EPA consider this new method for reporting CCT, and include new requirements in future versions of the specification.

Once again, the Committee would like to thank the Environmental Protection Agency for the opportunity to comment on the draft revisions to the ENERGY STAR Fixture specification. These comments are endorsed by the Supporting Organizations listed on page 4. Please contact CEE Residential Program Manager Rebecca Foster at (617) 589-3949 ext. 207 with any questions about these comments.

Sincerely,

Marc J. Hoffman

Marc Hoffman
Executive Director

[1] Documented in "An Examination of the Performance and Acceptance of Compact Fluorescent Bulbs and Fixtures in the Residential Market" by Brad Steele. Presented at the 2002 ACEEE Summer Study in Residential Buildings.

Supporting Organizations:

American Council for an Energy-Efficient Economy
Efficiency Maine
Efficiency Vermont
National Grid
Natural Resources Defense Council
Northeast Energy Efficiency Partnerships
Northeast Utilities
Northwest Alliance
NSTAR
Sacramento Municipal Utility District
Seattle City Light
Sempra Utilities
Tacoma Power
Unitil
Wisconsin Division of Energy
WMECO