

June 21, 2010

Mr. Alex Baker

ENERGY STAR® Lighting Program Manager

U.S. Environmental Protection Agency

Ariel Rios Building 6202J

1200 Pennsylvania Avenue

Washington, DC 20460

Re: EPA ENERGY STAR Luminaire Specification Draft 1 Version 1

Dear Mr. Baker:

Thank you for the opportunity to comment on the recently released ENERGY STAR Luminaire Specification Draft 1 Version 1. Efficiency Vermont has been a longtime supporter and implementer of ENERGY STAR specifications and programs. This has included strong support of the EPA ENERGY STAR RLF specification since 2000. Through our programs and initiatives, we have helped bring more than 150,000 RLF qualifying fixtures into the market. We will continue to be a strong supporter of the ENERGY STAR Luminaire Specification into the future.

Support for CEE

In addition to the comments submitted in this letter, Efficiency Vermont has participated with a national group of Utilities and Energy-Efficiency Programs through the Consortium for Energy Efficiency (CEE) to develop industry-wide comments to the specification. Efficiency Vermont supports the letter submitted on behalf of our industry through CEE. Efficiency Vermont's specific comments to the specification follow:

Commercial Luminaire / Scope of Specification

Efficiency Vermont commends ENERGY STAR's listing of commercial grade SSL products for the five categories addressed thus far: recessed downlights, undercabinet task lights, portable desk task lights, wall wash luminaires, and bollards. Through these specifications, Efficiency Vermont has built a platform for bringing quality SSL products into commercial buildings, and thus far more than 2,500 ENERGY STAR SSL Luminaires have been installed in commercial buildings in Vermont.



Using products with the ENERGY STAR® label can save energy. Saving energy reduces air pollution and utility bills.

However, we understand EPA is considering whether or not to continue to develop new commercial specifications for lighting products, and may not label commercial SSL products in the future.

In response, we would ask that EPA continue to label commercial SSL products and to expand the specifications to include other lighting technologies. We also ask that EPA develop new specifications for commercial lighting products not yet covered by ENERGY STAR. Like with residential lighting fixtures, not all commercial lighting fixtures are created equal, and there is both a real need and a real opportunity to acquire new energy-savings by identifying and labeling the top performing commercial lighting products with the ENERGY STAR brand. By branding these commercial products, utilities, energy-efficiency programs, their commercial trade partners, and their customers would have a valuable tool to assist in identifying the top efficient commercial lighting products. This would open new opportunities for lighting energy-savings, while driving innovation with improved lighting products.

Categorization of Luminaires

Efficiency Vermont supports the current categorization of luminaires into “directional” and “non-directional” categories as the basis of whether source efficacy or luminaire efficacy will be used for testing of that product type. Efficiency Vermont asks EPA to better define these categories so it is clear exactly which luminaire types fall into each, “directional” or “non-directional”.

Source Efficacy Levels

Efficiency Vermont supports the 70 Lumens per Watt minimum requirement for non-directional luminaires qualified using source efficacy. Because there is no photometric testing to determine fixture efficiency of luminaires qualified using source efficacy, it is important to set a relatively high but achievable bar as a requirement. Efficiency Vermont believes that 70 lumens per watt or higher is the appropriate requirement.

Luminaire Efficacy Levels

Downlights

Efficiency Vermont believes the proposed 42 Lumens per Watt luminaire efficacy for downlights is low. There are commercially available and affordable downlight products with efficacies that are 30-50% higher than the proposed specification. Many of these products are already qualified for ENERGY STAR.

Additionally, the ENERGY STAR Luminaire specification will not go into effect until later 2011, over one year from now. Because SSL and lighting technology is advancing so quickly, the products available a year from now will be more efficient than the products available currently.

Due to this delay in the effective date of the proposed specification and the existence of many available products that already far exceed it, Efficiency Vermont asks for a higher value for efficacy of downlights, 60 lumens per watt or higher.

Undercabinet and Portable Desk/Task Lights

Efficiency Vermont has similar comments to the proposed undercabinet and portable desk/task light efficacy of 29 lumens per watt. There are products of this type already qualified for ENERGY STAR that are 40 lumens per watt or higher. Efficiency Vermont asks EPA to set a minimum luminaire efficacy of 40 lumens per watt or higher for undercabinet and portable desk/task lights. .

We thank you for the opportunity to comment on the specification. Should you wish to discuss our comments, please do not hesitate to contact us directly.

Sincerely,

A handwritten signature in cursive script, appearing to read "Gabe Arnold".

Gabe Arnold
Lighting Program Manager