Good Earth Comments on ENERGY STAR Program Requirements for Residential Light Fixtures Draft 1 Eligibility Criteria – Version 4.0

After reviewing the proposed draft of the new Energy Star Lighting qualifications we at Good Earth Lighting would like to make the following comments:

INDOOR FIXTURES

Lamp Testing Requirements (Color Temperature, Lamp Life, and Lumen Maintenance)

Under the new guidelines we are required to either use lamps on the NEMA web site or submit NAVLAP testing for 10 of each ballast with the lamp being used. It is very difficult and costly for us to comply with these requirements for the following reasons:

1. Unlike ballasts, there are very few lamp suppliers on the NEMA web site. This limits our selection to these few suppliers, all of whom are the largest (and most expensive) suppliers on the market.
2. Many of the Energy Star fixtures, including those made by Good Earth, are produced in China. While we use very well qualified suppliers, all with ISO rating, and quality product, none have NAVLAP certified labs.

Therefore, we would have to undergo extremely expensive and long term testing on the lamps, with our already NEMA listed ballasts, or use only the lamps listed with NEMA.

Either way the cost of our fixtures will be very negatively impacted. We strongly suggest for the time being that Energy Star require test results for the lamps from the lamp supplier be submitted with the rest of the fixture testing, provided the fixture has a NEMA listed or NAVLAP tested ballast.

Durability - Lamp/Socket Compatibility

We are unclear of what is being asked. It says that if the ballast can operate multiple wattages it must be made to accept ANSI standard base lamps for those wattages. However, the ballast, multi wattage or otherwise, does not accept lamps, the socket does. Please clarify.

End Of Life

While we agree with end of life requirements, when we checked with one of the biggest NAVLAP labs - ITS - we found they do not have the equipment or know how to test end of life. This may present a problem short term (with this test requirement as well as some of the other tests required to be submitted from a NAVLAP lab).

Also, if we submit NAVLAP tests showing we pass the EOL tests, why do we also have to submit engineering description of the end of life scheme? The test results speak for themselves.

Replaceable Ballasts

We think it is a bad idea to give any explanation to the customer how to replace the ballast beyond suggesting they call an electrician. Most of the time replacement will require splicing inside a metal housing and we would rather not have the average consumer performing this task.

OUTDOOR FIXTURES - COMPLIANCE THROUGH EFFICIENT LIGHT SOURCE

Lamp Testing, Durability, End of Life, Replaceable Ballast

See comments in the Indoor section.

Special Application - Outdoor Fixtures

We believe that adding the Energy Star mark on any fixture that does not have a built in sensor will create a lot of confusion and should be eliminated. However, we do believe the wording in the revision should be allowed so the customer will understand how certain fixtures can be made Energy Star compliant.

Time Of Day Sensor

I am not sure what is being required. Our fixtures have light sensors, not time of day controls. If it gets dark during the day, such as rain storm, the lights will go on. Please clarify what is being required.

OTHER PROVISIONS

Ballast Temperature

We understand why the EPA would want to reduce the maximum ballast operating temperature in the fixture. Since most ballasts are rated for 90 degrees, if the ballast temperature in the fixture is 75 degrees it will result in longer ballast life.

However, once the ballast manufacturers know that the fixture manufacturers cannot exceed 75 degrees in the fixture, they will come out with a lower cost line of 75 degree rated ballasts. These ballasts will be lower cost since the ballast manufacturer will not be required to use such robust components. Therefore, the long term result will not be longer life ballasts, but actually cheaper ballasts with shorter lives at 75 degrees versus the current 90 degree ballast in the same application. Either way, there would be a short term jump in costs to bring fixtures into compliance, but in the long run, there will be cheaper 75 degree ballasts on the market. This actually goes against what the EPA is trying to accomplish.

We suggest no changes in the current EPA provisions in this regards.

Finally, if the new operating temperature requirement is accepted, then we should at least have a "grandfather" provision for at least 2 years since some products may have to be substantially altered to meet the new requirement.

Audits/Ongoing testing of Qualified Products

The proposed cost for auditing product to the complete Rev. 4.0 standard and charging the costs of retesting back manufacturers is much too expensive. We support an auditing program but feel there is a less costly, time intensive solution.

We look forward to working with the Energy Star program in 2005 and beyond!