



Hubbell Lighting, Inc.



Progress Lighting

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Date: January 14, 2010

To: Alex Baker

From: Tammy Grimm

Re: HLI Response to Energy Star Luminaires Standard Final Draft

Mr. Baker,

On behalf of Hubbell Lighting, Inc., and Progress Lighting please acknowledge the following comments taken from the final draft of the comprehensive Energy Star standard issued for stakeholder comments.

Sincerely,

A handwritten signature in cursive script that reads "Tammy Grimm".

Tammy Grimm
Product Manager – Progress Lighting



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1. Page 1 –Residential outdoor post-mounted luminaires are classified as directional. Most residential luminaires of this type include an omnidirectional decorative diffuser. Classification of this type of luminaire as directional is contrary to the requirements of the application. This requirement along with the necessary testing and performance criteria will essentially exclude this product type from qualification.
2. Page 1 – Exterior steplights, exterior pathway lights, and bollards have been omitted; however, they are currently specified in SSL 1.1. While typically installed in commercial applications, it is strongly encouraged that steplights and bollards be added back into the specification as there are significant energy savings opportunities with respect to SSL.
3. Page 11 – Is the certified component database going to provide efficacy for specific fluorescent lamp and ballast combinations showing compliance to the system requirements? Otherwise, the standard as it is written appears to require the fixture manufacturers to provide efficacy via testing. Reference page 17 requirements for light source life.
4. Page 12 - Halogen Incandescent (outdoor only):

“Improved product efficiency is achieved through minimized operating time. Qualifying luminaire shall operate with an integral in-line motion sensor device that meets the following criteria:

- *ensures automatic shut-off of the lamp(s) within 15 minutes of being manually activated by a switch or automatically activated by the sensor, and”*
Having an occupancy sensor “shut-off” the lamp(s) within 15 minutes of being manually activated is not advisable. If the switch is pressed when someone enters a room (which is a requirement for a vacancy sensor) the lamp(s) would be shut off after 15 minutes potentially while someone is still in the space. I know this is not the intent however the wording does dictate this. I would suggest that this sentence be change to require the lamp(s) to be turned off automatically after 15 minutes of no occupancy.

- *“automatically resets to sensing mode within 6 hours of a manual override or testing operation, and“*
The 6 hour time frame may not be advisable. I would suggest the device be required to return immediately to the sensing mode at the next change of state. (When the device senses a change from occupied to unoccupied or unoccupied to occupied) This would ensure that the device returns to the automatic mode in a more intuitive manner. A 6 hour period is very arbitrary and may in fact cause the device to stay overridden longer than necessary.

- *“has an indicator that visibly or audibly informs the device operator that the motion sensor is operating properly, or that it has failed or malfunctioned, and*



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- *meets Off-State Power Consumption Requirements in this Specification*

With the exception of manual override or testing operation, luminaires may not continuously operate the lamps. Luminaires may not offer any form of permanent motion sensor defeat. Additionally, instructions provided with luminaire may not detail permanent methods of defeat.

5. Page 24 –Lamp Shipment Requirements- Including lamps with recessed cans will present issues with the traditional rough-in installation procedure as well as potential issues with bulk shipping. Residential recessed cans are installed during the rough-in stages by electrical contractors. At this stage, the cans are secured to the ceiling supports and electrical power is connected. The following stages involve sheet rock going up, and then painting. Then, the electrical contractor returns to install the trims and lamps. It is not practical to ship lamps with recessed cans, nor is it practical as it relates to making necessary accommodations with master pack cartons.

The new final draft verbiage strongly encouraging manufacturers to ensure the lamp remains in the canister by shrink wrap or compression fitted cardboard during drywall installation and painting does not take into account that the installer typically must have access to inside the can to adjust the height prior to final installation and it is therefore impractical to seal off the can area until final install of the lamp.

Including lamp with the recessed can also inevitably increases complexity for the manufacturer and inevitably costs to the consumer by forcing the consumer to pay for a lamp that may be unsuitable for their color temperature needs.

RECOMMENDATION: As stated in draft 2 comments, there are no historical quality issues associated with the use of GX24q lamps in recessed cans that may have resulted from EC's installing "non-Energy Star" lamps. It is however likely that the use of GU24 self-ballasted CFL's in recessed cans will present quality issues. It is therefore strongly encouraged that EPA require lamps to be shipped with GU24 cans only, and that GX24 cans not be required to be shipped with lamps. In addition to protecting quality, this will assist in balancing costs between the two products (i.e. GX24 include a remote ballast, GU24 includes a self-ballasted lamp).

6. Page 24 – Clarity is needed on the solid state requirement that states "complete light source components must be provided with the luminaire". Most recessed luminaires include housings/cans that are sold separately from mating trims. In the case of LED recessed, the driver may be sold with the housing/can resulting in it being a dedicated element of the luminaire (i.e. the trim can't function without the accommodating housing/can). While the entire luminaire (housing/can + trim) may be Energy Star qualified, the respective elements may be qualified, sold, packaged, and shipped separately. It is therefore very likely that a



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- housing/can with an integrated driver but no light engine, and a trim with a light engine but no driver, may carry the Energy Star mark but not be shipped together. RECOMMENDATION: Allow luminaires to be shipped in separate components but still carry the Energy Star logo. It may be accepted to include a label on the respective cartons indicating that the Energy Star mark is valid if that particular product is installed for use with the accommodating mating sku. e.g 'Energy Star when used with....'.
7. Page 27 – The future database for luminaire component certification will include compliant ballasts and lamps from which the fixture manufacturers may select. Ballasts are designed to operate ANSI compliant lamps, and the lamps are also designed and produced to applicable ANSI standards. Due to the common practice of design and production to ANSI standards, testing of specific lamps used in a luminaire would not seem to be necessary, and is costly and time consuming for luminaire manufacturers to test. Further, the unavailability of a testing standard will likely add subjectivity and confusion to this requirement. RECOMMENDATION: Remove this requirement specific to luminaires. It is encouraged that this requirement be established as a general requirement for component/ballast certification considering use with EPA certified lamps.
 8. Page 27 – Beginning here, there are several requirements pertaining to qualification of electronic devices such as ballasts and solid state drivers. Under the 'Supplemental Testing Guidance' heading, there are many references to luminaire. A point of clarification is requested as to whether these test requirements pertain to the device or the luminaire. Further, clarification is requested on the correlation between the future device certification database and the various test/performance criteria for these devices in the luminaire standard.
 9. Page 27 – Dimming - There is no available standard nor established qualifying metrics from which luminaire manufacturers may follow to qualify luminaires. RECOMMENDATION: Remove this requirement from the standard until a test method and agreed upon metrics can be established. The current criterion for SSL fixtures is to note any known incompatibility with controls, and it is encouraged that this practice be continued in the interim to a new test standard.
 10. Page 28 - Halogen Incandescent (outdoor only):
“The luminaire shall contain an integrated photosensor that automatically prevents operation during daylight hours. In addition, the control shall automatically reactivate within 6 hours of a manual override or testing operation.”
The 6 hour time frame may not be advisable. I would suggest the device be required to return immediately to the sensing mode at the next change of state. (When the device senses a change from dark to light or light to dark) This would insure that the device returns to the automatic mode in a more intuitive manner. A 6 hour period is very arbitrary and may in fact cause the device to stay overridden longer than necessary.



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11. Page 41, 42 – External Packaging- All dimmable fixture types are required to provide indication of known compatibilities as well as incompatibilities on the external product packaging. This requirement may result in a significant number of compatible and incompatible devices to be included on luminaire packaging. While this is understood for retail products, it is impractical and costly related to specification or distributor type product.
RECOMMENDATION: Consider the requirement for inclusion of devices on retail packaging only. But it is strongly encouraged that this requirement be limited overall for inclusion on downloadable materials (e.g. specification sheets and/or installation instruction sheets) from manufacturer websites. This will provide the most updated information to consumers, will minimize product costs, and will be the most effective means of conveying changes to the market place.

12. Page 41 – RoHs Compliance – As stated in draft 2 comments, what evidence does EPA have to indicate that RoHs compliance at the luminaire level will significantly reduce the presence of heavy metals in the market place?
Compliance at the luminaire level will require significant changes to test lab infrastructure (test equipment, personnel, procedures, oversight, etc), and may present challenges as it relates to the simplest of components. For example, most wire insulation commonly used today is not compliant to RoHs. Maintaining this criterion will require luminaire manufacturers to further segregate production of Energy Star luminaires at significant cost (and resulting market pricing). See previous comments for more information.
RECOMMENDATION: Clarification is requested from EPA as to the value this will bring to the Energy Star brand in comparison to resulting increased costs and market pricing.

13. Page 44 – Warranty Requirements - It is recommended that warranty letters be required to be posted on luminaire manufacturers’ websites. This ensures that consumers have immediate access as well as the most up-to-date information related to the product.
RECOMMENDATION: Luminaire warranty letters should be required to be posted on manufacturers’ websites only.

14. HLI - General comment on the extensive testing and certification costs and extended testing scheduled required by this standard - The Energy Star program is aimed at high volume product because of the way it expresses testing and secondary validations. For companies that provide specification grade or custom products, the testing parameters will likely prove to be too costly and slow which in turn will drive customers away and toward high volume products that typically are manufactured in China.