



April 29, 2011

United States Environmental Protection Agency
ENERGY STAR Program
1200 Pennsylvania Ave NW
Washington, DC 20460

ENERGY STAR Program Managers,

Thank you for this opportunity to share our comments regarding the recent kickoff of the ENERGY STAR Lamps Version 1.0 specification development process.

Northeast Energy Efficiency Partnerships (NEEP), in collaboration with our efficiency program sponsors, has been an enthusiastic partner with ENERGY STAR since NEEP began fifteen years ago. The value of ENERGY STAR to advance energy efficiency in the Northeast has been immeasurable. As ENERGY STAR begins its process to develop a technology neutral specification for lamps (light bulbs), we wanted to raise a few general concepts that we think are worth consideration.

- First and foremost, we support EPA's effort to develop a technology neutral specification for lamps (light bulbs). As the lighting market becomes more and more diverse, it's a natural evolution to set efficiency specifications as well as performance specifications without specifying to the market how they should meet those requirements.
- We believe this lamp specification should continue to serve the replacement market primarily, focusing on applications that utilize the large majority of existing socket types. We would suggest that the light fixture specification and/or requirements as part of ENERGY STAR Homes is a more appropriate avenue to promote next generation fixture forms. With this in mind, the specification should be developed with high consideration of the replacement consumer.
- With the replacement consumer in mind, they will likely be looking for lighting characteristics similar to the incumbent technology (traditional incandescents).
- Efficiency increase should defer to performance requirements as the area of most reinforcement. From our perspective, the existing efficiency requirements provide an adequate incremental efficiency delta. By requiring stronger performance characteristics, ENERGY STAR would come to symbolize a stamp of quality for consumers most wary of performance short falls compared to their existing lamps. Therefore rigorous testing ensuring lifetime, color quality, start up/run up, etc should be areas of focus.
- As has been mentioned, ensuring performance is CRUCIAL. Specifically for CFLs, the cost barrier has shrunk greatly, leaving performance of high efficiency lighting as the primary barrier. The ENERGY STAR label could be an invaluable tool to identify high efficiency products that perform as well or better than the replaced technologies.
- Obviously, strong testing procedures are more important than ever. Tests for various technologies should be equally demanding.
- We would support reducing Mercury allowances.



- We would suggest that EPA research the issue of toxics in LED lamps and, if issues are identified, we would suggest addressing them through this specification.

Thanks, again, for this opportunity to provide our comments in the early stages of specification development. We look forward to a continued involvement in the process.

Sincerely yours,

[David Lis](#)

Appliance Standards Project Manager