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Ms. Jantz-Sell,

NEEP appreciates the opportunity to provide comment to the ENERGY STAR program as it works to develop a technology neutral specification for replacement lamps. NEEP appreciates ENERGY STAR's clarifications in response to NEEP's previous comment to Draft 3 of Version 1.0. After review of Draft 4 of Version 1.0, we wanted to share a number of reactions and recommendations below:

1. (Section 6) NEEP recommends that EPA incorporate the information included in the note "that testing for DOE regulatory metrics must be conducted by a NVLAP laboratory, and not all EPA-recognized laboratories have been accredited by NVLAP" into the final spec content to provide further clarity. (Page 6 of 30)
2. (Section 9.1) NEEP believes that a reduction in efficacy in exchange for a higher CRI is not in the best interest of this specification. NEEP supports the preservation of the high efficacy requirements in lamps. Therefore, we recommend that ENERGY STAR not adhere to the wishes of the stakeholder who offered the following trade-off:
  - *"A stakeholder has requested that EPA consider a lower efficacy tier across all product types for products with a color rendering index (CRI) of 90 or higher. The specific request was for a reduction of five lumens per watt for lower wattage products and an efficacy reduction of ten lumens per watt for higher wattage products. The stakeholder believes that lower efficacy levels for higher CRI lamps will help encourage the adoption of energy efficient lighting and increase the availability of ENERGY STAR certified products that are cost competitive. EPA believes color quality is important for the adoption of energy efficient lighting but that the existing levels in this specification adequately address color quality while balancing considerations such as product cost and energy savings. Further, reducing efficacy to accommodate lamps with higher color rendering is not supported by the lamp data in the current ENERGY STAR qualified products list or DOE's LED Lighting Facts® database which indicates LED lamps in the market can meet both the proposed efficacy requirements and a minimum CRI of 90. EPA invites stakeholders to comment on this subject." (Page 10 of 30)*
3. (Section 10) NEEP understands that ENERGY STAR is employing the LM-80 hour test in order to ensure that SSL product rated life and lumen depreciation are appropriately communicated to consumers and energy efficiency programs. NEEP also understands that the 6,000 or approximately 9-month period of testing for the Lumen Maintenance and Rated Life of Solid State Lamps is a major grievance for several manufacturing stakeholders. We therefore support ENERGY STAR's interim certification system, and we encourage ENERGY STAR to consider additions pathways to enable high quality products to enter the market in a timely manner. Possible alternatives to consider:
  - a. Researching alternative test procedures that can project lumen maintenance. While LM-80 is the industry standard, there may be a more timely test that could be developed.
  - b. Allowing for possible accelerated or interim certification for "next-generation" LEDs, or LEDs from a single manufacturer that while technically a new product, are based on a previous edition with improvements. The DLC offers a provisional certification using a similar system.
  - c. As more products are offering longer warranties, this could be a factor when assessing products that can be granted interim certification.



- d. There is a period of time between a product being certified by ENERGY STAR and that product being appropriately labeled, distributed, and promoted by energy efficiency programs. There might be a communications mechanism where if a product is nearing testing completion (i.e. at 4,500 hours and still at 98% lumen maintenance so unlikely to drop off suddenly), non-official early results could be provided to the manufacturer such that they can begin to plan and prepare products. In this case, the amount of time from certification to a customer's hand can be minimized. If the early result should be wrong, and a product does not end up passing the test, the manufacturers would be responsible for taking on the risk and cost of re-labeling their products.
4. (Section 12) In general, NEEP continues to support ENERGY STAR's approach to differentiate testing requirements for lamps designed to be operated with varying kinds of dimmers/controls (legacy phase cut dimmers versus next generation dimmers).
    - a. Additionally, NEEP believes that 10 dimmers from 2 different manufacturers will be a good safeguard to ensure that the dimmer results are properly reflected in the self-reported testing. Since this specification is new, allowing the testing to be undertaken by the manufacturers is acceptable. With this additional leeway of self-reporting, NEEP believes at or near 10 dimmers will achieve the intended objective of accurately reflecting the dimmer compatibility of individual lamps.
    - b. NEEP recommends that future ENERGY STAR lamp revisions include 3<sup>rd</sup> party certification for dimming capabilities.
    - c. We suggest having output requirements at the maximum dimmer setting 10% above or below the full lumen output (20% below seems excessive)
    - d. NEEP supports the measure for audible noise requirement (12.4) with multiple lamps on a line, as NEEP is under the impression that multiple lamps often increase the audible noise on the line as compared to one lamp.

Thank you for your consideration of these comments. Please contact me with follow up questions or clarifications.

Sincerely,

A handwritten signature in black ink, appearing to read 'Claire Miziolek', written in a cursive style.

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