

February 18, 2011

Alex Baker  
US Environmental Protection Agency  
Ariel Rios Building 6202J  
1200 Pennsylvania Avenue, NW  
Washington, DC 20460

Dear Mr. Baker:

The Consortium for Energy Efficiency (CEE) respectfully submits the following comments in response to the proposed enhancements to the labeling requirements in the ENERGY STAR Integral LED Lamp Specification, released by the Environmental Protection Agency (EPA) on January 19, 2011.

CEE is the binational organization of energy efficiency program administrators and a staunch supporter of the ENERGY STAR Program. CEE members are responsible for ratepayer-funded efficiency programs in 45 U.S. states and 8 Canadian provinces. In 2010, CEE members directed over \$7.5 billion of energy efficiency program budgets in the two countries. In short, CEE represents the groups that are actively working to make ENERGY STAR the relevant platform for energy efficiency across North America.

CEE highly values the role ENERGY STAR plays in differentiating energy efficient products and services that the CEE membership supports locally throughout the US and Canada. We appreciate the opportunity to provide these comments.

The comments included in this letter are in direct response to EPA's proposal to continue to have a category for non-standard lamps in the ENERGY STAR Integral LED Lamp Specification and to require enhanced labeling for these products. The current specification refers to non-standard lamps as "LED lamps of non-standard lamp type or form." EPA stated in their January 19 communication that they recognize that consumers are accustomed to employing standard lamp

shapes (per ANSI C79.1-2002) in their homes and businesses, and have an established understanding of what performance to expect from those shapes. EPA also expressed concern that LED lamps exhibiting standard shapes but not meeting the ENERGY STAR photometric performance requirements established for those shapes will disappoint consumers whose expectations are set in large part by physical similarities. Based on program experience, CEE agrees that consumer light distribution expectations are primarily derived from past experience and familiarity with lamp types and shapes that have existed in the market to date. As communicated in previous comments to DOE on March 4, July 6, and October 16, 2009, CEE shares this above stated concern.

## Questions Regarding Inclusion of “Non-standard” Lamps

At this time, CEE has not received a compelling basis to conclude that the energy savings benefits of including non-standard lamps in the Integral LED Lamp Specification outweigh the potential risk to the ENERGY STAR program from confusion regarding ENERGY STAR labeled non-standard lamps. We understand the stated interest by some stakeholders that non-standard lamps may be useful to some consumers for specific niche applications. In order to understand whether the case for ENERGY STAR labeling in this product area is compelling, CEE asks that EPA provide additional information in these areas:

an evaluation of applications for which non-standard lamps would be suitable;

the significance of the energy savings opportunity;

any areas where the proposed approach may deviate from the Program tenets; and

why the proposed approach (labeling or other means) is sufficient to manage any risks/extensions of the Program..

The current proposal offered at this time has not persuaded CEE that the approach is sufficient to enable consumers to make a fully informed purchase and avoid potential negative impressions about these products and therefore ENERGY STAR.

If EPA can provide a compelling case that the inclusion of non-standards lamps is a significant savings opportunity and that the approach (labeling or other identified requirements) would effectively mitigate or eliminate risk of customer confusion and dissatisfaction with the brand, then CEE agrees with the general objective of ensuring that consumers purchasing qualified non-standard lamps understand their intended use, the applications for which they are designed, and their limitations (i.e., not the same light distribution as standard products). CEE believes that clear

and precise labeling of luminous intensity distribution per LM-79-08 section 10 and appropriate application types is needed to communicate that non-standard lamps are not intended to replace standard lamp products, which could help to manage consumer confusion and potential dissatisfaction.

## Questions Regarding the Sufficiency of Proposed Labeling Requirements

CEE has reviewed the proposed labeling requirements and has several comments. CEE is not expert in packaging design but the comments are based on the many years of experience of its members in their messaging to consumers about efficient commercial and residential lighting options. CEE supports removing the provision that allows manufacturers to individually develop their own icons and agrees that a uniform labeling approach would help to provide increased consistency in the market. In addition, CEE supports the requirement that the system of iconography detailed in Appendix C of the Integral LED Lamps specification would no longer be optional and that the iconography must appear on the packaging itself proximate to the ENERGY STAR logo (not just in packaging inserts).

There are several concerns regarding the products being labeled with the language “non-standard lamp” and with the proposed system of iconography. First, CEE is concerned that consumers will not understand the term “non-standard lamp”. CEE encourages ENERGY STAR to research this area further and explore different terminology or strategies for better communicating this meaning to consumers. Second, CEE believes that consumers will be confused by the use of circles and “X’s” for the application types. There are particular concerns with the requirement that the recessed and table light icons be on all packaging. As currently illustrated, CEE interprets these icons as meaning that the product could be installed in a recessed can but not in a table lamp. CEE recommends that ENERGY STAR consider how to more clearly communicate light distribution and revise the icons accordingly.

CEE understands that a significant educational effort may be required to explain non-standard beam angles to consumers. CEE looks forward to working with ENERGY STAR to further develop, test and implement materials to meet this need if it is determined at the program level that non-standard lamps should be included within the specification.

Thank you for your consideration of these comments. Please contact CEE Program Manager Eileen Eaton at (617) 337-9263 with any questions.

Sincerely,



Marc Hoffman

Executive Director

## Supporting Organizations

Avista

Cape Light Compact

Efficiency Vermont

Hydro-Québec

Long Island Power Authority

National Grid

New York State Energy Research and Development Authority

Northeast Energy Efficiency Partnerships

NSTAR

Pacific Gas and Electric Company

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Seattle City Light

Southern California Edison

United Illuminating

Western Massachusetts Electric Company

Wisconsin Focus on Energy