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CIPCO has been an ENERGY STAR partner for about 5 years now and we promote the ENERGY STAR qualified lighting products by offering utility incentives. The 6,000-hour life for CFLs appears to be below what many non- ENERGY STAR qualified CFLs already have out on the market. Shouldn't this be at least 10,000 hours for the ENERGY STAR qualified products?

Also, power-factor-corrected CFLs have been available in the US for at least 15 years. The required power factor of 0.50 in the proposed ENERGY STAR criteria for CFL is what a typical CFL was at 10 years ago. ENERGY STAR qualified products should be better than that, especially when generation and distribution capacity is such a concern today for everyone.

Prices for CFLs have dropped to levels where we almost feel that incentives are no longer necessary. I realize that making these changes would probably reverse the price decrease somewhat and that prices may come back up. The reason we have incentives, however, is to help buy down the cost of higher quality equipment that benefits the consumer and the utility. Benefits to the utility are also passed down to the customer by helping keep the grid reliable and keeping rates stable. You won't see the oil companies giving money to consumers to purchase cars that use less petroleum. If electric utilities are to continue providing incentives for ENERGY STAR products, then specifications that help out the utilities that encourage their purchase should be considered.