



Cordelia Lighting Comments on ENERGY STAR Program Requirements for Residential Light Fixtures Draft 2 Eligibility Criteria – Version 4.0

After reviewing Draft 2 I have concerns regarding the proposed ballast and lamp qualification changes. In the commodity level residential market price is a large factor. In this market the added cost of these requirements will decrease the penetration of Energy Star fixtures.

Residential builders install the lowest cost fixture. Any fixture that meets local energy codes like California's title 24 is acceptable. They won't pay extra just for the Energy Star logo. They prefer to buy their own lamps again for cost reasons.

Retailers don't like to stock fixtures with lamps. It becomes a customer service problem. Complete fixtures are returned because of a broken lamp. Also they can get a higher margin selling their own lamps.

The margin is small for these types of fixtures. Beyond the lamp cost, packaging and shipping costs go up. Adding a quick disconnection device to the ballast adds more cost. Each fixture manufacture may have a unique solution. Will the retailer want to stock all the different replacement ballasts?

The requirement of adding lamps and ballast replacement without cutting wires will increase fixture cost. Fixture manufactures have no choice but raise prices to meet Energy Star requirements. When the residential builder or consumer is given a choice between a lower cost fixture and a higher priced Energy Star approved fixture, the Energy Star fixture will lose.