



Alex Baker
Energy Star Lighting Program Manager
United States Environmental Protection Agency
Washington, DC 20460

October 6, 2010

Dear Alex,

LittleFootprint Lighting has reviewed Version 1, Draft 2 of the Energy Star Program Requirements for Luminaires Eligibility Criteria and is pleased to have the opportunity to comment.

We are concerned with power factor requirements, in particular as they apply to Portable desk task lights. The current requirements make it extremely difficult for a desk lamp to meet Energy Star requirements while at the same time using the lowest possible wattage and maintaining an attractive price. We would suggest that EPA consider the following two changes:

- 1) Exempt luminaires that draw a total of 5W or less from the power factor requirement of 0.70 for residential and 0.90 for commercial. If there is a minimum required at all, it should be 0.50.** Reasoning:
 - a. The exemption would be consistent with Draft 1.1 of the requirements for Integral lamps which specifies power factor as follows: "<5W – no minimum; >5W – 0.7 or higher". It does not seem logical that a high power factor is required for a complete luminaire that draws <5W but not for a lamp of the same wattage.
 - b. In its own notes on page 29 of Draft 2 regarding power factor for residential fluorescent products, EPA states that "...high power factor has not proven to provide significant benefit to consumers OR the electrical grid..." It does not seem logical that this would be any less true for low wattage LED lighting fixtures which arguably use even less power than fluorescents. Even in a commercial situation, for example an office building with a low wattage LED desk lamp on every desk, the overall effect of a power factor of less than 0.9 in such desk lamps would appear to be negligible.
 - c. LittleFootprint Lighting and some of our partners spent weeks (and money) in search of an existing LED driver that could achieve a power factor of 0.9 when powering our <5W luminaire. We found none in the "normal" price range, and the quote we got for a custom solution was so high that it would have almost doubled our entire BOM cost and substantially delayed market entry. Given that it appears that the benefit of high power factor in this scenario is questionable,



the current requirement leaves the manufacturer with the unfortunate choice of wasting energy or money to meet the requirement.

2) Require power factor of only 0.5 or higher for residential SSL luminaires over 5W.

Reasoning:

- a. This change would be consistent with the 0.5 requirement for residential fluorescents on page 29 in Draft 2. As indicated above, there does not seem to be a good reason that fluorescents are allowed a lower power factor than SSL luminaires, especially given the fact the SSL fixtures probably use less energy.

We have heard many in the industry voice their concerns about the burden that the current high power factor requirements pose to manufacturers. It is certainly easy to imagine that the technical and cost issues now making it so difficult for low watt luminaires to achieve high power factor can be solved over the next few years given the speed of progress in our industry. Until then, however, we strongly urge EPA to make the changes suggested here so that we can increase the number of high quality SSL luminaires with Energy Star recognition available to consumers.

Thanks very much for encouraging us to provide this feedback.

Sincerely,
Nancy Wahl-Scheurich
CEO