



Memorandum

To: David Shiller
From: My Ton
Re: ENERGY STAR® Light Fixtures Eligibility Requirements Version 4.0
Cc: Brian Simmons, Ecos Consulting; Interested NW Electric Utilities; Nick Germana, ICF Consulting
Date: Monday, October 18, 2004

First, Ecos Consulting would like to commend the ENERGY STAR® lighting team for its management of the stakeholder process. Seeking input and participation from such a wide variety of stakeholders presents is a monumental task. We would also like to commend the team for a comprehensive and well-presented Version 4.0 final draft.

We have a few general comments that apply to the overall draft, and a number of particular items that we would like additional considerations and clarification. Our points are summarized below:

General Comments

In general, we found the revisions easy to follow and the added testing requirements are a long time coming. The only suggestion that we have is to review the whole document for consistency. For example, even though magnetic ballasts are now disallowed, there are references to "electromagnetic ballast" in the document.

Further, we suggest that definitions for "electronic ballasts" and "magnetic ballasts" be included to avoid any misunderstanding or opportunistic interpretation of the specifications.

Replaceable Ballast

Many parties have been vocal about this issue, as they feel the manufacturers have not addressed the replacement issues consumer may have. In our opinion, this issue may also stem from the quality (or lack of) of fixtures, rather than the need for consumers to tinker with products. It is our fear that we have already lost the good will of the consumer if they have to replace ballasts at any point, especially if these fail before the warranty period. In addition, to replace the ballast, a consumer must first have the ability to determine whether or not it needs replacing – this issue is not yet addressed.

We believe that manufacturers, and the Program would be better served, if manufacturers' resources can be spent to advance technology and product reliability. However, if EPA decides the ballast replacement issue is worth addressing, we suggest that EPA may consider the various fixture categories and address these separately instead of a "one size fits all" approach. For example, it is inherently easier to replace the ballast of a "ceiling round" than a downlight, so a "handy" consumer may be more inclined to do so.

In addition, this issue has the potential to tie into the issue of "adaptable" or "switchable" ballast (where a new lamp ballast combination can be substituted to achieve the desired light level), and not enough distinction is provided between these approaches. We believe that this latter approach has more merit, as it gives consumer more choices, without the added burden of actually taking apart an electrical apparatus and risk bodily harm.

We encourage EPA survey the market and determine what most homeowners would do in this situation, and whether or not the majority will call an electrician to change a ballast for them.

Effective Date for Version 4.0

We are concerned that no specific "grandfather" periods are considered for the new specifications. For organizations and utilities that implement lighting programs, this can be a significant challenge. An illustrative Northwest example can play out as follows:

Ace Hardware in Butte, Montana buys a magnetically ballasted fixture that is Energy Star-qualified at time of purchase from Westinghouse. This product remains on the shelf. In October of 2005, the same product is no longer Energy Star qualified. However, if Northwestern Energy (the utility serving Butte, MT) implements a consumer coupon program to encourage the purchase of Energy Star fixtures, it will be operating from a current list and will not pay for items that are not currently qualified. In this instance, the retailer will not get reimbursement for the incentive, but they would be more than likely have allowed the consumer to purchase the "ENERGY STAR" product, resulting in a retailer with a poor program experience.

We suggest that EPA take these out of the way examples into account in addressing specification changes, and allow for manufacturers or other market based solutions to the removal of existing products prior to the introduction of the new specifications.

CCI Performance Characteristics

We applaud any effort to increase the consistency of lamp color temperature performance, and we support the color temperature range specified. Our concern is the difficulties in communicating the changes, and the requirements to the general public. A related concern is that there are no minimum CRI requirements for lamps other than CFLs and linear fluorescents.

Replacement Lamps

We also support EPA's efforts in reducing the number of lamp/ballast combinations and thus the confusion in the marketplace for consumers, and we strongly agree with EPA's requirement for the inclusion of lamps in indoor fixtures. However, as program implementers, we continue to be concerned with the availability of replacement lamps for consumers. Until the CFL fixture is more ubiquitous, we believe a more concerted effort is needed. One possibility is to work with NEMA to set up a website for replacement lamps that consumers can access, linked to both local and/or a national fulfillment house to provide consumers with this service.

In closing, Ecos Consulting appreciates the opportunity to comment. Please contact us with any questions or concerns.