



September 20, 2005

Initial Comments of the CEE Lighting Committee on the ENERGY STAR CFL Criteria

- The ENERGY STAR CFL criteria should represent the most efficient, best performing products on the market.
- The ENERGY STAR CFL criteria should cover all CFLs, regardless of base type. The Committee believes that candelabra, mogul, and the “twist and lock” GU-24 bases should be covered. In order to achieve this and to allow future technology innovation, DOE should strike all reference to base type from the criteria.
- The Committee supports the comments of the PEARL Board on the third party testing component of the specification.
- The Committee supports the proposal to consider reflector CFLs as a separate category from bare and covered CFLs. Specifically, the Committee supports the elevated temperature testing, as it represents an important addition to the criteria.
- With regard to run-up time, the Committee supports the decrease in allowable time from 3 minutes to 1 minute for bare products. In addition, the Committee requests that DOE query the currently qualified products to see if the 3 minute allowance for covered and reflector CFLs can be shortened to 2 minutes. In order to fully meet consumer expectations, the Committee believes that run-up time should be as quick as possible, given the limitations of the technology.
- The Committee supports the proposed increases in efficacy, with the following suggestions:
 - DOE should compare the proposed levels with international specifications to see if greater alignment can be achieved.
 - DOE should review the efficacy information of currently-qualified CFLs to determine both the average and highest efficacy levels among ENERGY STAR products. This information should be carefully considered by DOE in setting the new efficacy levels; the Committee encourages DOE to set the levels close to the highest of those achieved by currently-qualified products.
- Shipment data of qualified CFLs is very important to efficiency programs. While state/province level data is desirable, until it is available DOE should ensure that accurate, timely national-level (US and Canada) data are publicly available to enable stakeholders to gauge the success of their efforts to promote this product category.
- DOE should develop a path to incorporate a mercury requirement within the ENERGY STAR CFL criteria. Specifically...
 - DOE should encourage manufacturers to distribute lamp recycling information through their 800 numbers, web sites, and packaging.
 - DOE should work with NEMA to develop a test procedure for measuring mercury content of CFLs.
 - DOE should consider implementing a 5 mg ceiling for all ENERGY STAR CFLs, using manufacturer self-certification or dosing reports to verify compliance.



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- The Committee is concerned with the wide variation in lifetime of ENERGY STAR-qualified CFLs (as demonstrated by PEARL testing). DOE should consider solving this problem as a high priority.
- The Committee supports the modifications to testing and reporting CCT within the proposed criteria.
- Prevention of “smoking CFLs” is a very high priority for the Lighting Committee. It is the Committee’s understanding that over-current protection can be used to prevent CFLs from smoking upon catastrophic failure. The Committee urges DOE to incorporate such protection within the CFL criteria.

Questions about these initial comments should be directed to Rebecca Foster, Residential Program Manager, at 617-589-3949 ext. 207. The CEE Lighting Committee will be submitting final comments in advance of the October 14 deadline.