



Setting Standards for Excellence

June 6, 2011

NEMA Comments on May 19 Energy Star Luminaire Program Proposals

Thank you for the May 19 letter to Energy Star stakeholders proving notification of EPA's intention to postpone the effective date of the new Luminaire program requirements and to take further steps to accommodate industry concerns. At your invitation, we provide the following additional comments to advise and guide proposed program decisions.

Certification Deadline and Effective Date

We appreciate your recognition that testing of lighting products can be a lengthy and costly process. That said, we reiterate our request that Energy Star provide sufficient time for manufacturing partners and EPA-approved labs and certification bodies (CBs) to accommodate training, capacity and backlog issues of which Energy Star has been made aware. For example, one of the major CBs announced recently a 6-month moratorium on submission of new luminaires for Energy Star certification. With EPA approval other CBs have entered the market recently, but changing suppliers of conformity assessment service providers is not a simple or quick process.

If Energy Star truly wants a program that from the consumer's perspective provides for a sufficiently broad and deep array of Energy Star third-party-certified luminaires in the market, then Energy Star should provide additional time beyond April 1, 2012. We recommend moving the effective date to July 1, 2012.

The newly proposed "stop certification" deadline of September 15, 2011 for qualifying under the old specifications (SSL 1.3 and RLF 4.2) is also too short. If Energy Star insists on maintaining separate stop certification and effective dates, then the stop certification date should be moved to December 15, 2011.

We reiterate our concern that Energy Star's use of two dates – one date for closure of certification activities under the RLF and SSL specifications and a second and later date for ending of eligibility to carry the mark for qualified products manufactured on that day or thereafter – is confusing. We would appreciate a clear summary of the rationales for two dates, as well as a definition of "effective date."

Testing Sample Sizes Under Luminaires V1.0

Following a fresh review of the technical requirements of Luminaires Version 1.0, we suggest that Energy Star consider reducing the testing time for new luminaires by reducing the sample size from three to one for electrical performance, dimming, power factor, transient protection, operating frequency, and current crest factor requirements. We note that Energy Star already deems that one sample is sufficient for thermal performance testing. However, because the specification now indicates that thermal performance characteristics are separate and distinct from safety requirements, we

suggest that clarification be provided to indicate that the performance data can be acquired simultaneously with the safety data to allow a single test sample and test to serve both purposes. We believe that the change from three samples to one will reduce overall test time, thereby expediting Energy Star labeled product to market.

Lumen Maintenance Projection Work-Around Proposal

We appreciate the work-around proposal you made to address the need to project lumen maintenance performance prior to the finalization and publication of, as well as lab accreditation to, IES TM-21. The existing method in IES LM-80 and the existing SSL Luminaires Manufacturers Qualification Guide V2.1 should be used until TM-21 is fully available.

However, the question arises how products that will be Energy Star qualified and certified using the Manufacturers Qualification Guide method will be treated after TM-21 is fully available. We recommend that products using the work-around not be subjected to testing for recertification when TM-21 becomes available. Furthermore, we request that Energy Star explicitly clarify that the test method used for initial qualification of these products be used for any subsequent verification testing.

Sub-Component Database

We request written clarification from Energy Star relative to the certified sub-component database and SSL. It is unclear to us if the proposed work-around for LM-82, using SSL V1.3, and the proposed work-around for TM-21 also apply to certification of LED light engines and GU-24 based LED lamps. We propose that they should and would appreciate the clarification.

Non-Directional SSL Luminaires

We question the precise meaning of the statement that the "September 15, 2011 date would not apply" for specified products (ceiling mounted luminaires with diffusers, outdoor wall-mounted porch lights and residential grade desk task lights) that could be allowed to continue to qualify under SSL V 1.3. Energy Star must provide clear statements about how these products and new products will be handled by testing labs and CBs prior to the availability of LM-82 and then once LM-82 is finalized and fully available to the market. It appears that Energy Star's proposal is that products in these 3 categories will be able to be certified by CBs using the SSL 1.3 specification until the day before the effective date of Luminaires 1.0. Is this true? The statement in your letter that "all products manufactured on or after that date must be certified to meet the Luminaires V1.0 performance levels" calls this interpretation into question.

Thank you for your consideration and acceptance of these recommendations. We look forward to proceeding with Energy Star on implementation of these changes as soon as possible to ensure a smooth transition from the current programs to Luminaires V1.0. If you have any questions about these comments, please contact Craig Updyke at NEMA at 703 841 3294 or cra_updyke@nema.org.