



June 21, 2010

Alex Baker
US Environmental Protection Agency
Ariel Rios Building 6202J
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Dear Mr. Baker:

Subject: Comments regarding ENERGY STAR® Program Requirements for Luminaires Version 1.0 Draft 1

INTRODUCTION

Northeast Energy Efficiency Partnerships (NEEP) respectfully appreciates the opportunity to comment on EPA's May 7, 2010 release of the ENERGY STAR Program Requirements for Luminaires First Draft. As we do so, we would also like to call out our support of the comments submitted by the Consortium for Energy Efficiency (CEE), to which NEEP is a signatory.

NEEP is a regional nonprofit organization founded in 1996 whose mission is to promote the efficient use of energy in homes, buildings, and industry in New England, New York, and the Mid-Atlantic states through regionally coordinated programs and policies that increase the use of energy efficient products, services and practices, and help achieve a cleaner environment and a more reliable and affordable energy system.

The efficiency programs that operate throughout the Northeast have and will continue to rely heavily on the ENERGY STAR platform to promote the benefits of energy efficiency. As the facilitator of the Northeast Retail Products Initiative, Commercial Buildings and Technology Initiative and a coordinator of efficiency program efforts in the region NEEP maintains a unique position of working closely with a broad group of program administrators and other stakeholders—all striving to maximize energy savings through individual and collective efforts. As such, NEEP is also a strong partner of the ENERGY STAR program with a vested interest in its success.

SCOPE OF SPECIFICATION/ COVERAGE OF COMMERCIAL GRADE PRODUCTS

NEEP commends ENERGY STAR's listing of commercial grade SSL products for the five categories addressed thus far: recessed down lights, under-cabinet task lights, portable desk task lights, wall wash luminaires and bollards. NEEP urges EPA to complete its development and implementation of the outdoor fixture categories currently in process, as soon as



possible. NEEP further urges EPA to add other commercial SSL luminaire categories according to market availability, to establish coverage of the full range of commercial fixtures.

EFFICACY FOR DIRECTIONAL vs. NON-DIRECTIONAL LUMINAIRES

NEEP commends EPA's decision to require efficacies for directional luminaires be tested at the "luminaire" level and we strongly support that this requirement remain intact. However, given the rapid progression of solid-state lighting products, technologies, and manufacturing R&D, as well as the proposed 2011 effective date, NEEP strongly suggest that EPA increase luminous efficacy requirements across all "directional" luminaire types, including both residential and commercial applications as well as solid-state lighting and fluorescent lighting sources, to a level that represents the top 20% most efficacious commercially available products. NEEP suggest that EPA conduct further research to determine what efficacy criteria will capture these top tier products. NEEP believes that this research and resulting luminous efficacy criteria is necessary to maintain the market credibility of the ENERGY STAR program.

Similarly, NEEP agrees that source efficacy is appropriate for non-directional luminaires and supports the minimum 70 lumens per watt requirement.

CONCLUSION

In conclusion, NEEP again extends its thanks to EPA for offering this opportunity to share our comments on the ENERGY STAR Program Requirements for Luminaires and we look forward to continuing our partnership with EPA to help guide efforts to bring energy efficient lighting to the broader public.

Sincerely,

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