

January 14, 2011

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

Dear Mr. Baker:

The [DesignLights™ Consortium](#) (DLC) respectfully submits the following comments on the ENERGY STAR® Program Requirements for Luminaires, Eligibility Criteria—Version 1.0, Final Draft from December 20, 2010. These comments were developed by the DLC Advisory Group, and they are supported by the organizations listed below.

The DLC is an organization, composed of program administrators, dedicated to quality and energy efficiency in lighting design for commercial buildings. DLC is managed by [NEEP](#), and its signature project is the Solid State Lighting Qualified Products List ([QPL](#)), a listing of commercial integral SSL fixtures, which operates in parallel with the corresponding ENERGY STAR list, but covering only categories of fixtures which ENERGY STAR does not cover. DLC has consciously kept its processes and specifications aligned with ENERGY STAR and the DOE SSL team, in order to be ready for such a time as our qualified products lists may converge to one.

DLC is supported by 25+ members covering energy efficiency programs in more than 28 states and 2 Canadian provinces as well as substantial support from NRCanada. The DLC SSL QPL is a major program tool on an international scale, referenced by SSL manufacturers and used by energy efficiency programs as a requirement for incentives.

Many of the DLC members are also members of the Consortium for Energy Efficiency (CEE) and may endorse the CEE comments also.

Energy Star Strategy for Commercial Products and for Whole Buildings

DLC would like to understand how an ENERGY STAR presence in commercial lighting fits within the broader ENERGY STAR approach to the commercial sector which focuses on energy efficiency at the whole building level. DLC asks that ENERGY STAR work with us and other affected stakeholders as quickly as possible to determine the program's role in the commercial sector so that we can use the outcome in our program planning efforts.

Commercial Luminaires

DLC is mainly concerned with the changes in the Final Draft concerning Cove Lights and Accent Lights shifting from ENERGY STAR's residential to commercial designation. DLC has no current category specification for cove lights. We applaud ENERGY STAR's move to cover this category, as we believe that ENERGY STAR is a proper home for a commercial luminaire category of qualifications. We believe, however, that 'Accent Lights' as defined in the Final Draft may add an element of confusion among stakeholders.

DLC's QPL currently lists a category of 'Track and Monopoint Directional Lighting Fixtures', fashioned after a category from early drafts of ENERGY STAR's commercial luminaires specification. In fact this category covers nearly 30% of product families on the list, and nearly half of total products within these families. By itself, the addition of an 'Accent Lights' category to the ENERGY STAR Luminaires specification as the category is defined in the Final Draft opens up potential confusion among

applicants for qualification. We believe that there should be one commercial SSL category of ‘Track Heads’ rather than two, and that the natural home for this should be ENERGY STAR.

In order to merge the DLC ‘Track and Monopoint Directional’ category with ENERGY STAR’s ‘Accent Lighting’ category we would have to add clarity in the category’s definition and align the specifications, but we believe this is do-able. Our specifications of significant parameters vary slightly at this juncture:

| Parameter | DLC Category Specification | ENERGY STAR Final Draft V1.0 |
|---------------------|---------------------------------|------------------------------|
| Name | Track and Monopoint Directional | Accent Lights |
| Minimum Output | 250 lm | 200 lm |
| Efficacy | 30 lm/W | 35 lm/W |
| Zonal Lumen Density | ≥85% 0° to 90° | ≥80% 0° to 40° |

The Minimum Output and Efficacy values are close, so we see no problem in coming to a cooperative agreement on these values.

The name of the category ought to be fully descriptive and clear in order to promote acceptance, understanding and use by market players. We believe that ‘Track and Monopoint Directional Heads’ is a clear and effective name.

The Zonal Lumen Density values diverge significantly. The DLC value covers virtually all down-light, 180° from the luminaire, while the ENERGY STAR value demarks a cone of light, 80° wide coming out of the fixture. The ENERGY STAR value describes accent lighting while the DLC value describes general illumination. Considering the current state of the SSL market, we believe that the ENERGY STAR zonal lumen density values would adequately cover available market-ready products. At this juncture LED lighting is not ready for directional heads for general illumination. (General illumination from directional heads is better accomplished by conventional sources such as CFLs.)

We have studied directional performance of the 29 families of Track Lights on the DLC QPL as of 12/22/10, and found that

- 28 of 29 fall within the ENERGY STAR ZLD values. In fact, all but two exceed the 80% requirement by more than 10%.
- All but two products meet the ENERGY STAR efficacy value of 35 lm/W
- All fixtures meet the ENERGY STAR value for minimum light output

If and when ENERGY STAR assumes the single category for commercial track light heads, DLC will need to notify manufacturers responsible for our 290 listed products, so that they may make necessary arrangements for their responsibilities during the transition. DLC will work cooperatively with ENERGY STAR on this.

Therefore DLC recommends the following:

1. ENERGY STAR re-name its ‘Accent Lights’ category to ‘Track and Monopoint Directional Heads’
2. ENERGY STAR sets its values of ZLD, efficacy and minimum light output in consultation with DLC.
3. ENERGY STAR works with DLC to assume its 29 product families and 262 additional family member fixtures onto the ENERGY STAR qualified products list and to develop procedures to make the transition through the effective period, to October 1, 2011.

Thank you for your consideration of these comments. Please contact DLC Program Manager Jon Linn at 207-338-9705 with any questions.

Sincerely,

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Members of DLC as of January 14, 2011

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| BC Hydro | NSTAR Electric |
| Cape Light Compact | NYSERDA |
| Commonwealth Edison | PECO |
| CT Light & Power | PG&E |
| Efficiency Maine | PSNH |
| Efficiency Vermont | Salt River Project |
| Hydro Quebec | SCE |
| Long Island Power Auth. | SDG&E |
| MEEA | SMUD |
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| NHEC | WECC |
| Natural Resources of Canada | WMECo |