

March 2, 2017

Taylor Jantz-Sell
US Environmental Protection Agency
Ariel Rios Building 6202J
1200 Pennsylvania Avenue, NW
Washington, DC 20460

Dear Ms. Jantz-Sell:

The Consortium for Energy Efficiency (CEE) respectfully submits the following comments in response to the ENERGY STAR® Lamps Specification Version 2.1, released by the Environmental Protection Agency (EPA) on January 26, 2017.

CEE is the binational organization of energy efficiency program administrators and a staunch supporter of the ENERGY STAR Program. CEE members are responsible for ratepayer-funded efficiency programs in 45 US states, the District of Columbia, and seven Canadian provinces. In 2014, CEE members directed over \$6.7 billion of the \$8.7 billion in energy efficiency and demand response program expenditures in the two countries. These comments are offered in support of the local activities CEE members carry out to actively leverage the ENERGY STAR brand. CEE consensus comments are offered in the spirit of strengthening ENERGY STAR so it may continue to serve as the national marketing platform for energy efficiency.

CEE highly values the role ENERGY STAR plays in differentiating energy efficient products and services that the CEE membership supports locally throughout the US and Canada. We appreciate the opportunity to provide these comments.

CEE Supports the Continued Recognition and Promotion of Lamps with $\geq 25,000$ -Hour Lifetimes but Recognizes the Market Benefits of ENERGY STAR Establishing a 15,000-Hour Lifetime Requirement for All Lamp Types

The quality and reliability of LED replacement lamps are important aspects of consumer satisfaction with energy efficient lighting. CEE supports ENERGY STAR efforts to help consumers

identify the best quality high efficiency lamps in the market to deliver a positive experience with energy efficient products. We support ENERGY STAR applying a consistent definition of lifetime for all lamp types, unless there is a compelling limitation for a particular category.

Since the release of the ENERGY STAR Version 2.0 Lamps Specification in December 2015, EPA has indicated that a greater variety of directional LED lamps are entering the market, many of which are now price competitive with incumbent technologies, similar to a trend observed in early 2015 for other lamp types. However, otherwise high quality directional LED lamps with rated lifetimes that are less than 25,000 hours are not currently able to be certified against rigorous ENERGY STAR requirements intended to address consumer satisfaction, such as light output equivalency, elevated light output ratio, and long-term elevated temperature lifetime testing. CEE supports ENERGY STAR expanding its market influence for directional lamp types such that products with lower lifetimes and competitive pricing can be made available to a broader set of consumers while maintaining key lighting quality attributes. This is strategically important for the program industry to help ensure a positive customer experience for energy efficient products. For example, ENERGY STAR elevated temperature lifetime testing provides programs with assurance regarding the product reliability of directional lamps in a variety of applications.

While CEE supports the ENERGY STAR program's change to a 15,000-hour lifetime requirement, we believe consumers will benefit from continued support of the development of high quality, longer lifetime lamps in the market. CEE enables recognition and promotion of such products through the [CEE Residential Lighting Initiative](#) and the [CEE Specification for Integral Replacement Lamps Sold at Retail](#). This CEE platform enables members to support products that meet the higher performance tiers, which include standards for higher efficacy, improved color rendering, higher power factor, lower dimming, and longer lifetimes, in their programs. In particular, members have indicated that they wish to promote lamps with lifetimes longer than 15,000 hours in order to communicate a greater value proposition to consumers, reduce product waste, and claim greater lifetime energy savings.

CEE Supports the Adoption of an Industry-Accepted Test Method for Perceptible Flicker

CEE supports the inclusion of a test method that addresses perceptible flicker in dimmable lamps as part of the ENERGY STAR specification, given concerns over the performance of dimmable lamps used with existing dimmer switches in the home and consumers' negative reactions to perceptible flicker. We support a test method that has been carefully vetted with industry stakeholders and has been determined to be robust for the range of products and applications served by the ENERGY STAR Program. We further support a test method that has been determined to yield consistent results.

CEE would once again like to thank the EPA for the opportunity to comment on Version 2.1 of the ENERGY STAR Lamps Specification criteria. Please contact CEE Senior Program Manager Eileen Eaton at (617) 337-9263 with any questions about these comments.

Sincerely,

A handwritten signature in blue ink, appearing to read "Ed Wisniewski". The signature is fluid and cursive, with the first letters of the first and last names being capitalized and prominent.

Ed Wisniewski
Executive Director