

## Chat Comments Received During 11/12/2015 Lamps V2.0 Stakeholder Call

**[11/12/2015 1:11 PM] Gelder, Austin:**

For the reduction in lifetime for omnidirectional to match decorative lamps, was there a reason that EPA did not make the same proposal for directional lamps?

**[11/12/2015 1:13 PM] Horowitz, Noah:**

for lifetime, you mentioned receiving confidential data from manufacturers. Can you share these in a sanitized version. AND Can you clarify what you mean by all 10 lamps must be working. At what time period is that 3000 hours? 6000 hours? and does failure mean LM < x% - Noah Horowitz

**[11/12/2015 1:14 PM] Serres, Anthony:**

Pass rate is SSL only?

**[11/12/2015 1:14 PM] Jonathan Vollers:**

so for lumen maintenance we would use the 86.7% (at 6000 hr.) for 15,000 rated life?

**[11/12/2015 1:15 PM] Seth Craigo-Snell:**

Presumably, EPA understands that there is not a single CFL that is currently ENERGY STAR certified that would meet the new efficacy requirement of 80 lpw for products with CRI <90.

**[11/12/2015 1:15 PM] Horowitz, Noah:**

how do these changes apply to CFLs?

**[11/12/2015 1:16 PM] Dan Mellinger:**

Does the lower power factor requirement (0.5) apply to omni, directional, or both? - Dan Mellinger, Efficiency Vermont

**[11/12/2015 1:18 PM] glths01:**

Chi See Sam from Curtis Strauss/ Bureau Veritas . according to draft 4 , you mentioned "Intended to avoid the need for partners to retest " , and draft 3 "providing warranty information via URL".. can you provide more information about it.

**[11/12/2015 1:29 PM] Gelder, Austin:**

For the new efficacy levels, has any thought been given on how this will impact the ENERGY STAR Luminaires Specification V2.0, as Section 8 of the Luminaires Specification references ENERGY STAR Lamps.

**[11/12/2015 1:29 PM] Dan Mellinger:**

For the aspects of the spec that are being "weakened" could manufacturers qualify immediately upon a final spec or would they have to wait 12 months? If these changes are intended to address the "ish" bulbs on the market, waiting until Jan 2017 seems much too long. A grace period make sense for requirements that become more stringent, but not for specs that are lowered.

**[11/12/2015 1:30 PM] Serres, Anthony:**

Pass rate referred to the pass rate slide, not life testing. Seem like SSL only

**[11/12/2015 1:43 PM] Horowitz, Noah:**

regarding power factor, can you talk more about the justification for reducing it. Do you have any data on the incremental cost to go to 0.9, which many of the products today meet. Also I believe some of the utilities care very much about this issue.

**[11/12/2015 1:44 PM] Claire Miziolek:**

I'm wondering the justification for 61 lpw for high CRI directional lamps...it seems that many products qualify higher than that level even with 90+ CRI

**[11/12/2015 1:57 PM] Gaines, Jim:**

There is a risk that, if Energy Star lowers its specs, the ISH bulbs will also lower theirs, to maintain a cost advantage, and the entire market could shift to 'poorer quality'. Has ES considered this? Do you have some insights on whether this is likely to happen?

**[11/12/2015 1:59 PM] Dan Mellinger:**

Jim: would lower cost ES bulbs *with* a rebate compete with cost reductions by ish bulbs? Currently ish bulbs are able to undercut ES bulbs + rebate.

**[11/12/2015 2:05 PM] Burger, Reene:**

The delta would be the determining factor between the two

**[11/12/2015 2:08 PM] Dan Mellinger:**

Sorry for the audio problems. Comment was that current rebate levels would likely be able to be maintained since these spec revisions are not lowering efficacy vs. current.

With that said, most utility programs have price floors. Hopefully programs would be willing to revise their price floor in order to compete with ish bulbs.

**[11/12/2015 2:10 PM] Dan Mellinger:**

Price floor is a minimum price that retailers can charge. For example, \$3.99 or \$4.99 is common.

**[11/12/2015 2:10 PM] Claire Miziolek:**

Question if EPA would consider allowing CFLs an extra 6 months after the effective date to stay on the QPL to help ease transition between tech neutral and all-LED?

**[11/12/2015 2:10 PM] Dan Mellinger:**

After rebate

**[11/12/2015 2:11 PM] Burger, Reene:**

most programs do not have a floor , but rather a maximum rebate such as 50% of the retail

**[11/12/2015 2:14 PM] Burger, Reene:**

CFL's still have a need in low income areas, I agree with Claire

**[11/12/2015 2:16 PM] glths01:**

Chi See Samfrom Curtis Strauss/ Bureau Veritas. according to draft 4 , you mentioned "Intended to avoid the need for partners to retest " , and draft 3 "providing warranty information via URL".. can you provide more information about it.

**[11/12/2015 2:17 PM] Horowitz, Noah:**

you have three other calls scheduled. Do today's participants need to participate in the future calls or simply submit followup comments if desired

can you send out high level summaries of the future calls so non participants know what they might have missed

**[11/12/2015 2:18 PM] Seth Craigo-Snell:**

Understanding that test data submitted from manufacturers on lower cost LED products is highly confidential, would ENERGY STAR/ICF be willing to supply a simple listing of the products (by model number) that were reviewed that would meet the current interim proposal for the luminous intensity distribution?

**[11/12/2015 2:21 PM] Burger, Reene:**

CFL's are less than that with rebates

**[11/12/2015 2:27 PM] Gaines, Jim:**

Not sure if this was covered: If lifetime will be lowered, will lumen maintenance testing time also be lowered from the current 6000 hours?

**[11/12/2015 2:28 PM] Jonathan Vollers:**

15,000 rating is a 86.7% lumen maintenance...I am assuming that will be the bar to hit correct?

**[11/12/2015 2:30 PM] cprimous:**

One comment for future calls. Please make sure to note early in the call as a discussion point that these proposals cover all products (except lifetime) and the efficacy targets effectively eliminate CFLs

**[11/12/2015 2:31 PM] Jonathan Vollers:**

thanks