LUTRON ELECTRONICS CO., INC.

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VIA EMAIL TO: ceilingfan@energystar.gov

Ms. Abigail Daken
ENERGY STAR Program
U.S. Environmental Protection Agency
1200 Pennsylvania Ave., NW, MC 6202A
Washington, DC 20460

ENERGY STAR Residential Ceiling Fans 4.0 Draft 1 Comments

Dear Ms. Daken,

Thank you for the opportunity to review and provide comments on EPA's ENERGY STAR Residential Ceiling Fan Specification 4.0, Draft 1. These comments are submitted on behalf of Lutron Electronics Co., Inc.

As you may know, Lutron was founded in 1961 and is headquartered in Coopersburg, Pennsylvania. From dimmers for the home, to lighting management systems for entire buildings, the company offers more than 17,000 energy-saving products, sold in more than 100 countries around the world. In the U.S. alone, Lutron products save an estimated 10 billion kWh of electricity, or approximately $1 billion in utility costs per year. The company's early inventions— including the first solid-state dimmer invented by Lutron's founder, Joel Spira—are now at the Smithsonian's National Museum of American History in Washington, DC.

Please find our detailed comments below. We look forward to working with you further on this important project. Please contact Steve Irving at 610-282-6468 or sirving@lutron.com if you have questions or would like more information on these comments. Thanks again for your consideration.

S. Pekka Hakkarainen, PhD
Vice President
Lutron Electronics Co., Inc.

cc: Taylor Jantz-Sell, EPA
Lucy deButts, DOE

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1. ALA Comments
   Lutron helped develop the ALA industry consensus comments, and supports them.

2. Controls
   Traditional hard-wired fan-speed controls, like those offered by Lutron, have almost universal compatibility with ceiling fans using AC motors, but are not compatible with fans with DC motors. Controls for fans with DC motors are typically unique to a specific fan or line of fans.

   Lutron does not have a recommendation at this time.

3. Requirements for CFLK Flicker and Dimmer Compatibility Testing
   As NEMA-77 was developed for all SSL lighting loads and flicker is possible in dimmed and non-dim SSL lamps alike, we recommend having the flicker standard apply to all CFLKs. It is our understanding that EPA will additionally consider flicker requirements in the next full revision of the Lamps specification. Making this change now will ensure that all CFLKs meet flicker requirements. Lutron strongly supports the ALA proposal.

   NEMA SSL-7A is intended to ensure that dimmers and dimmable high-efficacy lamps are compatible. Lutron strongly supports the use of NEMA SSL-7A to ensure dimmable CFLKs are compatible with dimmers.

4. Connected Functionality
   We support the approach of harmonizing the requirements for Connected Functionality with those in Luminaires 2.0. Connected functionality is most useful when implemented across multiple product categories, and therefore it is key for EPA to offer consistent requirements/interpretations.

   Additionally, Lutron appreciates EPA's willingness to describe functions in Connected Functionality without prescriptive requirements, which would limit innovation.