



January 05, 2023

**VIA: [lighting@energystar.gov](mailto:lighting@energystar.gov)**

Ms. Taylor Jantz-Sell  
Manager  
Lighting Program  
ENERGY STAR  
U.S. Environmental Protection Agency  
Washington, DC 20460

**RE: ENERGY STAR Lighting Program Sunset**

Dear Ms. Jantz-Sell:

These comments are submitted on behalf of the American Lighting Association's (ALA) members regarding the U.S. Environmental Protection Agency's (EPA) proposal<sup>1</sup> to sunset the ENERGY STAR specifications for lamps, luminaires, and ceiling fan light kits.

ALA strongly agrees that the ENERGY STAR's lighting program is a government program success story. Since its inception, the program has increased consumer awareness and acceptance, pushed for technological advances and most importantly saved energy. The decision to sunset most of the program is not an easy one to make, but it is the right one to make.

**Lamps and Ceiling Fan Light Kits**

ALA concurs with EPA's common-sense determination that technology and other government efficiency programs are outpacing the ENERGY STAR lighting program. The latest proposal<sup>2</sup> from the Department of Energy will push the lumen per watt baseline for light source products well beyond the current specification. EPA is correct that new specifications are no longer necessary for lamps and ceiling fan light kits.

There is a growing trend towards sunsetting efficiency requirements for light source products as government entities other than EPA are also realizing that product efficiency levels are exceeding current standards. For Example, the California Energy Commission has a proposal<sup>3</sup> to end the bulb-in-the-box requirement for portable luminaires, citing similar reasons. ALA plans to submit comments supporting this proposal. Furthermore, ALA is hopeful that Congress will direct the Department of Energy to end their bulb-in-the-box requirement for ceiling fan light kits.

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<sup>1</sup>

<https://www.energystar.gov/sites/default/files/asset/document/ENERGY%20STAR%20Lighting%20Sunset%20Proposal%20Memo.pdf>

<sup>2</sup> <https://www.energy.gov/sites/default/files/2022-12/gsl-ecs-nopr.pdf>

<sup>3</sup> <https://efiling.energy.ca.gov/Lists/DocketLog.aspx?docketnumber=22-AAER-02>

### **Luminaires**

As for luminaires, ALA believes that EPA has not made a compelling case for sunseting the luminaires portion of the program. Specific to recessed downlights, ALA argues that there is still considerable value in continuing this specification. Minimum efficiency and performance standards do not exist for this product category outside of the ENERGY STAR specification. ALA's members are of the opinion that if the luminaire specification is allowed to sunset, then it will create a race to the bottom.

ALA is willing to reconsider this position, if EPA can provide evidence that a transformation has occurred for downlights like it has with lamps.

### **Proposed Timing**

The timeline for the phase out of the ENERGY STAR lighting program is more than acceptable. However, ALA urges EPA to be vigilant for misuse or abuse of the ENERGY STAR logo by bad actors up until and after the program officially sunsets.

### **Conclusion**

ALA believes it is no small feat to bring together advocates, industry partners, manufacturers and utilities for a singular cause. ALA thanks the staff of the lighting program for their dedication to advancing energy efficiency and public service.

ALA looks forward to a continued relationship with ENERGY STAR and the promotion of energy-efficient products. Thank you for the opportunity to submit comments.

Respectfully Submitted,



Eric Jacobson, CAE  
President & CEO



Larry Lauck  
Executive Vice President



Michael Weems  
Vice President,  
Government Engagement

### **About ALA**

ALA represents over 1,200 member companies in the residential lighting, ceiling fan and controls industries in the United States, Canada, the Caribbean and Mexico. Member companies are manufacturers, manufacturers' representatives, retail showrooms and lighting designers.

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