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Taylor Jantz-Sell
Energy Star Lighting Program Manager
United States Environmental Protection Agency

VIA EMAIL: lighting@energystar.gov

Dear Taylor:

Responsive to the November 14, 2022 letter to Energy Star stakeholders concerning the sunseting of the Energy Star specifications for lighting devices, Feit Electric Company, Inc. ("Feit Electric") submits the following comments.

The Energy Star lighting program has been tremendously successful prompting both the advancement and adoption by consumers of energy efficient lighting, particularly LED lighting. By incrementally raising the performance requirements over time, suppliers have been well motivated to advance performance across the board: reduced energy consumption; increased lumen output; improved light quality; and, life. By providing a certification mark consumers could rely on, consumers could be confident purchasing, and installing, and using energy efficient lighting. The Energy Star lighting program also united the lighting supply chain and the electric utilities in support of consumers.

Most importantly, the Energy Star lighting program provided consumers with a certification mark that they could rely on to select, purchase, and install quality, energy efficient lighting products. Electric utilities also made use of the Energy Star lighting program as a standard to be met for consumer incentives which sped adoption of energy efficient lighting.

For over forty years, Feit Electric has been a supplier of lighting products to national, regional, and local retailers throughout the United States. Feit Electric has been an active participant in the Energy Star program and Energy Star certified products have been an important part of our offerings. It is my opinion that ending the Energy Star lighting program will prematurely end the accrual of the aforementioned benefits before the full extent of the potential benefits are realized.

The certification mark function for consumers is still operative. Consumers look for and rely on the ENERGY STAR mark as an indication of not only energy efficiency but also quality of performance. Ending the Energy Star lighting program will leave consumers with no clear authoritative indication to inform and support their lighting decisions. A hodge-podge of state and federal regulations will not provide consumers with the clear guidance that they have come to rely on.

In addition, while incentive programs may be on the decline, new products and new electricity capacity issues might revive incentive programs in the future and they will need a trusted standard for incentives.

While many believe that energy efficient lighting based on LED technology has reached a level of performance that does not require the support of an Energy Star lighting program to foster innovation and adoption, what if LED technology has not yet truly reached its limit? What if there is another technology that could benefit from the push and pull forward of an Energy Star lighting program? The preservation, further development, and refinement of a trusted standard to spur further innovation and provide incentives for adoption would be helpful.

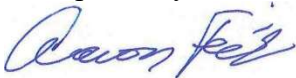
We are also deeply concerned that the end of the Energy Star program for lighting will also lead to the proliferation of poor quality and potentially unsafe products with false or misleading performance claims. There are already such products in the market but Energy Star certification holds the line against such products by providing retailers and consumers a certification mark that they can rely on as an indication of quality and performance.

The cost of the Energy Star program for lighting could be reduced for both the government and for the suppliers. For example, by: scaling back the government administration of the Energy Star lighting program; establishing a web site for sellers based in the United States to list ENERGY STAR certified products and to post the test reports for those products; permitting self-testing for sellers based in the United States; permitting self-certification for sellers in the United States; and, allowing Energy Star program participants to police each other.

The Energy Star program should at least provide a transitional period or a long sunset, continuing the Energy Star program until 2028 based on the standards for LED lamps recently announced by the Department of Energy in “Energy Conservation Program: Energy Conservation Standards for General Service Lamps” (10 CFR Part 430, EERE-2022-BT-STD-0022, RIN 1904-AF43). The new standard sets very high efficiency requirements for general service lamps. Setting the Energy Star standard to those new targets would likely encourage manufacturers to improve performance in a shorter timeframe ahead of the new 67-123 lumens per watt efficiency requirements. The additional energy savings in five years, especially in view of across-the-board inflation and energy costs rising at a rate even greater than inflation, is a laudable pursuit.

Feit Electric supports the continuation of the Energy Star program for lighting and would be pleased to assist in updating the program for the future and to participating in a continued program. Please do not hesitate to contact me if Feit Electric can be of any assistance in this matter.

Respectfully submitted,



Aaron Feit
Chief Executive Officer

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CC: Joel Jacobson, Feit Electric