



UNITED STATES ENVIRONMENTAL PROTECTION AGENCY
WASHINGTON, D.C. 20460

California Energy Commission

DOCKETED
12-AAER-2B

TN 71972

SEPT. 13 2013

OFFICE OF
AIR AND RADIATION

September 12, 2013

VIA EMAIL TO: docket@energy.ca.gov

Mr. Ken Rider
Associate Electrical Engineer
California Energy Commission (CEC)
Efficiency and Renewable Energy Division

EPA Comments For Light-emitting Diodes (LEDs) Standards: Lighting (Docket #12-AAER-2B)

Dear Mr. Rider:

Thank you for the opportunity to comment as part of the California Energy Commission's process to develop efficiency standards for LEDs. The Environmental Protection Agency (EPA) shares the CEC's interest in driving greater energy efficiency. We also recognize that LEDs represent a meaningful savings opportunity, as the majority of installed lighting is still low efficiency. We appreciate that voluntary and regulatory approaches to improving the efficiency of products can go hand in hand and offer value at this time when efficiency is so critical to curbing global warming.

As you know, the ENERGY STAR label is intended to make it easier for consumers to identify the most energy efficient products in the market. Accordingly, ENERGY STAR performance levels are established so that a relative small percentage of models meet them when the specification goes into effect. Because efficiency standards serve a distinctly different function, - namely, to eliminate the worst performance - careful consideration should be paid in terms of whether and when to incorporate ENERGY STAR performance requirements into a standard.

In conjunction with voluntary programs such as ENERGY STAR, lighting standards can play an important role setting a baseline which will protect consumers from low quality products, but also can serve to protect a new promising technology from failing in the marketplace. Where established industry standards exist, for example, IES LM-79 Electrical and Photometric Measurement of Solid State Lighting Products, performance baseline levels can be drawn, and resources such as, DOE's LED Lighting Facts database, provide an excellent platform for leveraging that test data.

Thank you, again, for the opportunity to provide comments in the early stages of the standards development process. We look forward to participating in your process going forward, please contact me or Peter Banwell with questions, comments or concerns at (202) 343-9408 or banwell.peter@epa.gov.

Sincerely,


Ann Bailey, Director
ENERGY STAR Product Labeling
U.S. Environmental Protection Agency

