

Appliance Standards Awareness Project
American Council for an Energy-Efficient Economy

March 7, 2025

Dr. Jordan Wilkerson
U.S. Department of Energy
Office of Energy Efficiency and Renewable Energy
Building Technologies Office, EE-5B
1000 Independence Avenue SW, Washington, DC 20585

RE: Docket Number EERE–2024–BT–TP–0010: Final rule; Delay of Effective Date for the Test Procedures for General Service Lamps

Dear Dr. Wilkerson:

This letter constitutes the comments of the Appliance Standards Awareness Project (ASAP) and the American Council for an Energy-Efficient Economy (ACEEE) on the final rule; delay of effective date for the test procedures for general service lamps (GSLs). 90 Fed. Reg 9001 (February 5, 2025). We appreciate the opportunity to provide input to the Department.

DOE should not further delay the effective date of the GSL test procedure final rule. In January 2025, DOE published a test procedure final rule for GSLs following a public notice and comment period. The final rule provided clarifications to the test procedure that are necessary for manufacturers to know how to appropriately test their products. For example, the test procedure updates specify that components that do not impact light output shall be turned off during testing, and that a lamp that can operate in multiple modes should not be tested as a colored lamp. While the delay of the effective date does not affect the compliance date of the amended test procedures, further delay would harm manufacturers by creating uncertainty regarding important clarifications that manufacturers need to test and certify their products.

Thank you for considering these comments.

Sincerely,



Rachel Margolis
Senior Technical Advocacy Associate
Appliance Standards Awareness Project



Matt Malinowski
Director, Buildings Program
American Council for an Energy-Efficient Economy