

Appliance Standards Awareness Project
Northwest Energy Efficiency Alliance
National Consumer Law Center

December 26, 2024

Mr. Bryan Berringer
U.S. Department of Energy
Office of Energy Efficiency and Renewable Energy
Building Technologies Office, EE-2J
1000 Independence Avenue SW, Washington, DC 20585

RE: Docket Number EERE-2024-BT-TP-0010: Notice of Proposed Rulemaking on Test Procedures for General Service Lamps

Dear Mr. Berringer:

This letter constitutes the comments of the Appliance Standards Awareness Project (ASAP), the Northwest Energy Efficiency Alliance (NEEA), and the National Consumer Law Center, on behalf of its low-income clients (NCLC) on the notice of proposed rulemaking for test procedures for general service lamps (GSLs). 89 Fed. Reg 92855 (November 25, 2024). We appreciate the opportunity to provide input to the Department.

DOE has proposed clarifications to the GSL test procedure in Appendices W, BB, and DD to Subpart B of Part 430 to ensure test consistency and repeatability. As outlined below, we support these proposed clarifications. We also agree with DOE's tentative determination that these clarifications would not alter the measured efficacy of GSLs and would not require retesting or recertification.

We support the proposed clarifications for lamps with multiple modes. As DOE explains in the NOPR, for lamps with multiple modes, the existing specification to "operate the lamp at the maximum input power," could potentially result in a color-tunable lamp operating as a colored lamp, which is exempt from the definition of GSLs. DOE has proposed to revise the language to specify to "operate the lamp at the maximum input power and not as a colored lamp." In addition, DOE is proposing to specify that if the lamp can operate at multiple color correlated temperature (CCTs), the lamp should be tested at 2700 Kelvin (K) (or the closest available CCT greater than 2700 K). We agree that this specification is an appropriate modification for these lamp types.

We support the proposed clarifications for lamps with non-illumination components. For lamps with components that do not affect light output (e.g., a speaker), DOE has proposed that any such components that are able to operate in standby mode should be turned off. We believe this proposal provides necessary clarity and improves representativeness for lamps that offer functionality that does not impact light output.

We support the proposed specifications for non-integrated LED lamps. Section 3.4 of Appendix DD currently specifies to “operate non-integrated LED lamps at the manufacturer-declared input voltage and current.” In the NOPR, DOE has instead proposed specifications for how to select a fluorescent lamp ballast or external driver and, if applicable, the starting method and/or ballast factor. We believe that these proposed additional specifications related to the selection of a test ballast will improve repeatability while also ensuring that the test procedure is representative.

Thank you for considering these comments.

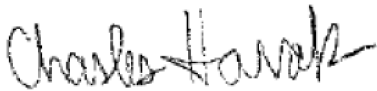
Sincerely,



Rachel Margolis
Senior Technical Advocacy Associate
Appliance Standards Awareness Project



Nicole Dunbar, PE
Codes & Standards Engineer
Northwest Energy Efficiency Alliance



Charles Harak, Esq.
National Consumer Law Center
(On behalf of its low-income clients)