



July 14, 2021

Honorable Jennifer Granholm
Secretary
U.S. Department of Energy
1000 Independence Ave., SW
Washington, DC 20585

Dear Secretary Granholm:

We are writing to urge you to promptly implement energy-saving standards for all types of everyday light bulbs commonly used in U.S. homes. Prompt implementation of these standards is among the fastest acting things you can do to start cutting carbon emissions and save consumers money at the same time. Further delay is extremely costly: each additional month will cost consumers about \$300 million in lost savings and cause 800,000 tons of easily avoided climate change emissions over the lifetimes of bulbs sold in that month.

In a 2007 law, Congress required the Secretary of Energy to develop new standards for general service light bulbs by January 1, 2017 that would take effect on January 1, 2020. However, if DOE either failed to comply with the procedural steps laid out in law or failed to establish a standard that met a minimum savings threshold, the law required the Secretary to implement a “backstop” standard of 45 lumens per watt (lpw). Unlike most other DOE standards, this requirement applies to bulbs sold as of the compliance date rather than bulbs manufactured as of that date.

DOE failed to comply with the procedural steps required in the 2007 law and did not complete any new standard by January 2017. In early 2017, DOE did complete a rule that expanded the scope of DOE’s light bulb regulations to include a broad range of bulb types commonly used in homes, including various shapes, sizes and base types. At the same time, DOE acknowledged that the backstop standard would take effect in January 2020. However, under the Trump administration, DOE reversed course, first rescinding the expanded definition, which had the impact of excluding the bulb types used in roughly two billion household lighting sockets from being subject to the efficiency requirements, and then issuing a determination that the backstop would not apply. Both actions were illegal and are under court review.

Although several types of light bulb technologies can meet a 45 lpw threshold, LED products, which easily double the minimum efficiency required, have outpaced all competitors. They are widely available in all the common bulb types included in the expanded definition, low-cost and very long-lived,

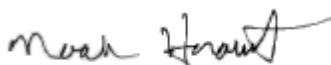
providing great light and value. However, inefficient incandescent and halogen bulbs still make up about one-third of current sales. Research shows that stores where many low- and moderate-income consumers and seniors typically shop, such as grocery stores, pharmacies, and corner stores, are least likely to stock affordable LEDs. Your action to implement the backstop standard and to reinstate the updated 2017 definitions will spread the benefit of this technology to all consumers, especially those who most need the savings.

DOE [initiated action](#) to put the statutorily required bulb standards in place in May. We submitted [technical comments](#) to that proceeding last month. Advocates for consumers, particularly those with the lowest incomes, similarly [called for prompt action](#). Manufacturers took the opportunity to request at least another year of delay from publication of a final DOE rule.

Each month that goes by without these standards results in tens of millions more inefficient light bulb sales. Bulbs sold over the course of another year of delay would cost consumers \$3.4 billion and increase emissions by 9.5 million tons over their time in use.

We urge you to explore every option at your disposal for prompt issuance of the backstop standard including for all the bulbs in the expanded definition and to allow no more than 60 days for sellers to come into compliance for the highest sales volume bulbs and 120 days for bulbs that sell out more slowly. Please act now to re-institute the broad definition and implement the backstop standard.

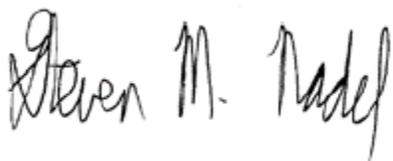
Sincerely,



Noah Horowitz
Director
Center for Energy Efficiency Standards
Natural Resources Defense Council



Andrew deLaski
Executive Director
Appliance Standards Awareness Project



Steve Nadel
Executive Director
American Council for an Energy-Efficient Economy

copy: Gina McCarthy, National Climate Advisor
Kathleen Hogan, Acting Undersecretary for Science and Energy
Kelly Speakes-Backman, Acting Assistant Secretary for Energy Efficiency and Renewable Energy