



Gary R. Hamer

Senior Energy Management Engineer
Technical Solutions
Phone: 604-453-6388
E-mail: gary.hamer@bchydro.com

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Richard Karney
ENERGY STAR Program Manager
US Department of Energy
1000 Independence Avenue SW
EE-2J
Washington, DC 20585

Subject: Recommended Enhancements to CFL Energy Star Program Eligibility Criteria

Through BC Hydro's affiliation with CEE we were pleased to support the comments sent to you recently from the CEE Lighting Committee. I would however like to add a couple of additional comments, for your consideration, from our experience in testing Energy Star CFLs in a local testing facility – Powertech Labs.

Approximately two years ago we commissioned Powertech to test some models of lamps that we were supporting in our CFL promotional campaign. Since that time Powertech was certified by the Standards Council of Canada (SCC) to ISO 17025. It is my understanding that through a Mutual Recognition Agreement ISO 17025 and NVLAP accreditation are deemed equivalent. The test results from Powertech have convinced us of the importance of continually testing this product category and advancing the criteria as appropriate.

We would be happy to discuss those test results with you at another time but for now I will focus on the technical issues of the test procedure. Specifically, we identified two areas where the Energy Star testing criteria should be enhanced. They are:

Starting Time: The protocol presently defines Starting Time as "time after switching on until full start (and remain lighted)." In many cases the full start is obvious, but we have seen several lamp types that have a smooth, linear increase in light output over many seconds, with no obvious starting time. In these cases this definition is insufficient. We recommend that the protocol be amended to specify a light threshold (perhaps 25% of normal output) to define starting time more clearly, in the same way that the run-up time is defined as the time to 80%. For those lamps with a step start this would not change the results, while for the smooth transition lamps it would define the requirement more clearly.

Labelling: There is no requirement for part number or batch number labelling on the product or packaging. This makes it extremely difficult and perhaps impossible for a test lab to unambiguously identify the product under test. It would be very helpful if the criteria required lamps to be permanently marked with a model number and a batch number or production date to facilitate product tracking.

BC Hydro is very interested in promoting the use of CFL products to our customers and, through our ongoing support of NRCan and CSA, we want to see the product category not only thrive but improve. Our testing work continues with members of the Canadian Electrical Association. We want to ensure that product sold in Canada is tested with the same rigor as in the US. We look forward to supporting your Energy Star programs in any way we can.

Gary Hamer, P Eng

.c Katherine Delves, NRCan, Office of Energy Efficiency
Bruce Neilson, Powertech Labs
Rebecca Foster, Consortium for Energy Efficiency