

From: Moeller, Dave [mailto:Dave.Moeller@avistacorp.com]
Sent: Monday, August 25, 2008 7:51 PM
To: ssl@energystar.gov
Subject: ENERGY STAR Program Requirements for SSL Luminaires - Category "A" Additions
Importance: High

I have some comments to your **ENERGY STAR Program Requirements for SSL Luminaires – Category "A" Additions** August XX, 2008 draft:
http://www.drintl.com/temp/ENERGY_STAR_Cat_A_Additions_final.pdf

You have requirements for initial lumens per watt, but none shown for depreciation or how much depreciation after so many hours - please add something,.

Your chart early in the document only allows color temperatures for residential down lights to 3500 K, how about some of around 4100 K to match a nice crisp cool white but in a high color rendering version like the very popular F32 T8 in SPX4100K?

I did not see anything about color rendition - this is a big issue, especially with in-expensive lamps.

How about color shift with respect to operating hours and temperature?

How about dimming?

Also, please require labeling as to all of these factors listed above - all consumers are not ignorant - take a look at typical CFL labeling - very little meaningful data on most - many people would like to know life and what is defined as end of life - like initial lumens and ending lumens at how many hours (not just 100,000 hours but only 30% light output at that point) color temp, color rendering, input watts, lumen output, operating temperature range (both high and low), if it works on a dimmer and what type, and of course the voltage and frequency range.

We support the cutoff of light above 85 degrees as dark skies are very important.

Thanks, Dave

Dave Moeller, Senior EE
Avista Utilities - (mail stop: MSC-51)
Phone 509-495-4426
FAX 509-777-5617