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

September 14, 2011

Ms. Brenda Edwards
U.S. Department of Energy
Building Technologies Program
Mailstop EE-2J
1000 Independence Avenue, SW
Washington, DC 20585-0121

RE: Docket Number EE-2007-BT-STD-0016: Notice of Data Availability for Fluorescent Lamp Ballasts

Dear Ms. Edwards:

This letter constitutes the comments of the Appliance Standards Awareness Project (ASAP), American Council for an Energy-Efficient Economy (ACEEE), and Natural Resources Defense Council (NRDC) in response to the Department of Energy (DOE) request for comments on the notice of data availability (NODA) for fluorescent lamp ballasts. 76 Fed. Reg. 52892 (August 24, 2011). We appreciate the opportunity to provide input to the Department.

We reiterate our support for standards based on the most efficient commercially available ballasts. The DOE analysis for the notice of proposed rulemaking (NOPR) indicated that standards based on the most efficient commercially available ballasts would yield large national energy savings and significant net present value savings for consumers and businesses.

We support the comments submitted by the California IOUs on the NODA, and we particularly want to reinforce the following two comments:

1. **We encourage DOE to ensure that the highest efficiency levels do in fact represent the most efficient commercially available ballasts.** As noted by the California IOUs in their comments on the NODA, the highest efficiency level (EL3) for Instant Start and Rapid Start ballasts does not appear to reflect the efficiencies of the most efficient commercially available 4-lamp ballasts.[1]
2. **We oppose a separate product class for "residential" ballasts. A separate product class for residential ballasts is not warranted because (a) DOE has not shown that "residential" ballasts provide a unique consumer utility; and (b) it appears that "residential" ballasts can meet the same efficiency levels as "commercial" ballasts.** As the California IOUs explain in their comments on the NODA, DOE has not shown that "residential" ballasts provide a unique consumer utility. DOE noted in the technical support document (TSD) for the NOPR that FCC regulations for EMI do not apply to

[1] We note that for this rulemaking DOE has determined that the most efficient commercially available ballasts represent "max-tech" levels.

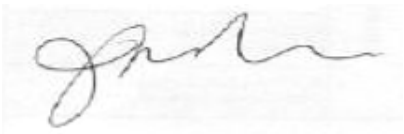
fluorescent lamp ballasts.[2] In addition, while the power factor of "residential" ballasts is typically lower than that of "commercial" ballasts, there is no consumer utility associated with a low power factor.

Even if DOE were to conclude that "residential" ballasts (i.e. ballasts with low power factors and EMI filtering) do provide a unique consumer utility, DOE has not shown that "residential" ballasts cannot meet the same efficiency levels as "commercial" ballasts. The NODA notes that additional DOE testing indicated that 4-lamp "residential" ballasts may not be able to achieve the same efficiency levels as "commercial" ballasts. 76 Fed. Reg. 52898. However, we do not believe that it is appropriate to conclude that "residential" ballasts cannot meet the same efficiency levels as "commercial" ballasts based on the DOE test data for 4-lamp residential ballasts for two reasons. First, 2-lamp ballasts are far more commonly used in the residential sector than 4-lamp ballasts, which are almost exclusively installed in commercial buildings. This relative scarcity of 4-lamp fixtures in the residential sector indicates that there is a significant potential for misuse of 4-lamp residential ballasts in commercial installations, if a weaker standard applies to 4-lamp residential ballasts. Secondly, the BLE of the most efficient 4-lamp residential ballast (91.7) is actually lower than the BLE of the most efficient 2-lamp residential ballast (92.0). Given the established relationship between BLE and total lamp arc power, we would expect that the most efficient 4-lamp ballast would be able to achieve a higher BLE than the most efficient 2-lamp ballast, since the 4-lamp ballast will inherently have a higher lamp arc power. We note that the most efficient 2-lamp "residential" ballast tested by DOE exceeds the highest efficiency level for "commercial" Instant Start and Rapid Start ballasts. Therefore, based on the performance of 2-lamp "residential" ballasts, there is no need for a separate lower standard for "residential" ballasts.

Thank you for considering these comments.

Sincerely,

Andrew deLaski
Executive Director
Appliance Standards Awareness Project



Jennifer Amann
Buildings Program Director
American Council for an Energy-Efficient Economy

[2] http://www1.eere.energy.gov/buildings/appliance_standards/residential/pdfs/flb_nopr_tsd_ap05e_emi.pdf. p. 5E-2.

Pierre Delforge
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Natural Resources Defense Council