

April 19, 2023

Taylor Jantz-Sell
EPA
ENERGY STAR® Program

Subject: ENERGY STAR Recessed Downlights V1.0 First Draft Comments

Dear Ms. Jantz-Sell:

Thank you for the opportunity to comment on Draft 1 of the recessed downlights requirements. Our global comments are compiled below:

Section 1 – SCOPE, or Section 4 – DEFINITIONS

Please include a definition of recessed downlights and recessed downlight retrofit kits intended for this set of program requirements. For example, there are downlight luminaires that are partially surface mounted, but the driver is recessed in the ceiling. The driver may be mounted to the luminaire housing or may sometimes be connected by a length of wiring and simply placed inside the ceiling compartment. Are these types included in the scope? (Please contact me for specific commercial links or pictures for examples.)

Section 8.1 – Luminous Efficacy

90 lm/W efficacy is a very high bar to meet for many common recessed downlight product variations such as small beam angles, wall wash throws, or dark reflectors. For example, consumers purchase many recessed downlighting systems with specialized optics for quality and uniform illumination of smaller areas. This results in a loss of flux, but not energy consumption.

Are all options on a marketing sheet required to be certified, or does the partner have an option to certify a subset of these variations? If all options are required, we propose a range of efficacy requirements.

Included Options	Minimum Efficacy
White or no reflector added, Beam Angles \geq 20 degrees	90 lm/w
Any other reflector color, Beam Angles < 20 degrees or Wall Wash optics	75 lm/w





General – Program requirements for certified “model name or number”

Some of the large variances in efficacy in the present QPL is due to inconsistent model number nomenclatures which were certified previously. There can be a huge number of options in beam angles, reflectors, optics, and trims in most downlight families to allow for customer preferences. Some partners even utilize different definitions for “trims.”

Previously, some partners only wanted the series name to be certified, and other partners prefer to include the various options. This makes it very difficult for consumers or retailers to compare efficiency levels.

How will the various certified options be handled in the QPL? For example, do all variations on a marketing sheet need to be certified, or does the partner have an option to certify a subset of these variations? We would suggest that any options that affect efficacy be bracketed and separated by a pipe symbol (i.e.: [30|60|80]) and any options that do not affect efficacy be noted as [OPTIONS] or similar.

Please feel free to reach out to me at any time with any questions or clarification requests.

Yours sincerely

A handwritten signature in black ink that reads "Jacki Swiernik".

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