

From: [Lockner, Jeffrey](#)
To: lighting@energystar.gov
Cc: [Vyas, Shivani](#)
Subject: ENERGY STAR Recessed Downlights V1 Draft 2 Comments
Date: Friday, July 28, 2023 9:15:27 AM
Attachments: [image001.png](#)

Ms. Taylor Jantz-Sell
Manager Lighting Program
ENERGY STAR
U.S. Environmental Protection Agency
Washington, DC 2046

Dear Ms. Jantz-Sell:

Thank you for the opportunity to comment on the Recessed Downlights V1.0 Draft 2, we appreciate your consideration. Our comments and points of clarification are as follows:

Section 5.2 – The directional lighting category requires that the full luminaire be tested for the different metrics. Light Engine testing utilizing LM-82 does not seem appropriate for a directional luminaire. We suggest removing this section.

General Comment on **Section 6 Product Family** methodology. It has been stated by the EPA that the goal is that any currently certified models to the Luminaires v2.2 specification could be reevaluated and certified to the new specification without additional testing. The newly proposed family grouping methodology would however necessitate retesting for a family of models. The “base model” in the Luminaires v2.2 methodology was the version with the highest wattage and worst case efficacy and the newly proposed methodology in Downlight v1.0 Draft 2 would require the highest wattage and highest efficacy.

Couple comments on CCT.

- It is stated that for CCT variations that the base model tested should be the one with the highest input power. In regards to previously certified models from Luminaires v2.2, this might not be the CCT of the model tested.
- Since the selection of CCT is now based on highest wattage and not on lowest CCT should the below footnote #1 be removed or modified?

¹ Partners may not retroactively add variations to a product family unless requirements in Table 1 are still met. For example, if the representative tested model has 3000K nominal CCT, Partner may not retroactively add a 2200K model without additional testing.
² When wattage as a variation is used, changes to optics and LED package, array, or module (where applicable) are not permitted, as these changes would result in a change in distribution which must be re-evaluated against the downlight specific requirements. The additional models would still require an integrating sphere LM-79 test to verify other photometric and electrical performance requirements. Each wattage variation should be listed individually.

ENERGY STAR Program Requirements for Recessed Downlights - Eligibility Criteria Version 1.0

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Best Regards,

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